DRAFT

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TO: P. H. WYCHE, JR. D-8078

FROM: H. V. BRADLEY, MANAGER
WASHINGTON WORKS

STANDBY STATEMENT DRAFT

F-143 WASHINGTON WORKS

Please consider the following comments and questions for the standby statement. Some of the new questions can be answered in the text of the draft by rewording or an additional Q and A can be included.

1. First sentence should go in second paragraph. Suggest start by saying, "Small quantities of the chemical ammonium perfluorooctanoate, (also known as FC-143) are discharged to the Ohio River and emitted to the atmosphere from our fluoropolymers operations at Washington Works. These amounts have been reported with the appropriate governmental agencies.

2. Paragraph 2, second sentence - at beginning of sentence, add (Analysis by extremely sensitive methods show barely) detectable levels . . . etc. Need to stress the point that 1 ppb is a very tiny amount.

3. Paragraph 3 - What does moderate toxicity mean?

4. Paragraph 4 - Rather than "area around the plant", say "area adjacent to the plant" or "at the plant perimeter".

5. What is the concentration on the plant?

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6. Page 2, first sentence:
   - o Why have you developed a plan to replace FC-143?
   - o What is the replacement material?
   - o Have toxicity and ~~epedamiological~~ EPIDEMIOLOGICAL studies been made on replacement?
   - o Does it have similar characteristics to FC-143?
   - o If FC-143 does no harm, why are you working to replace it?
   - o If FC-143 causes no harm, why are you making this news release?
   - o Is there some other concern with FC-143?
   - o Are you telling us everything?
   - o You say this stuff accumulates in the blood. Isn't that harmful?
7. Q2 - What is FC-143? A2 should say "ammonium perfluorooctanoate" somewhere.
8. A4 - What is TBSA? Should add to end of first sentence, "in part of our process which will eliminate most of the FC-143 which goes to the river".
9. A4 - second sentence - Shouldn't FC-143 be TBSA instead?
10. A5 - add "that means that the amount in the blood would decrease by 50% every 2 years with no additional exposure".
11. What level is present in the blood of Washington Works employees?
12. A6 - ..."reduction of 20-33 percent" (per year or over what period of time?)
13. A9 - Is it true to say emissions in air have been substantially reduced since 1980? Perhaps we have reduced emissions at lower (ground) levels such as the concentrations quoted indicate, but more of the emissions are just going up the stack instead of coming out at the drier level. Total emissions to air have probably increased with Fine Powder production. However, better dispersing through the tall stacks lowers concentration at all ground level areas.
14. Why are you trying to reduce the air emissions if they don't harm anything?

15. Q10 - Maybe a better question would be - What can you do to reduce the emissions to air? Then the AIO will be okay if you add to second sentence, "such as scrubbing and incineration" and add to the last sentence "to see if any are economically and practically feasible".
16. A11 - Didn't we confirm the concentrations projected by the math model by actual air samplings and analysis? If so, add to sentence.
17. How does the C-143 get into the water supply - scrubbed out of air or backflow from the river?
18. For your information, see the attached letters to Division of Water Resources and to Air Pollution Control Commission. They were informed of the amount of output and the erroneous and corrected facts on the teratogenic concerns. We do not believe retention of FC-143 in the blood has been discussed with them.
19. The water suppliers have not been informed and certainly should be before any release or even any response to the media. This needs to be carefully considered.

HVB:aw

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