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RE: PFC Contamination in Dalton Area Surface and Drinking Water

March 20, 2008

On February 10, 2008 the Chattanooga Times Free Press published a story about the discovery of perfluorooctanoic acid and other perfluorinated chemicals (PFCs), in the Conasauga River and ponds and streams of Dalton, Georgia. The “staggeringly high” levels PFOA found in the River were reported to be among the highest ever measured in water at a non-spill location. This alarming discovery was made by a former University of Georgia professor and his graduate students who conducted their research in 2006 and 2007. Although drinking water was not sampled during this study, independent sampling by the United Steelworkers Union has revealed the presence of PFOA and other PFCs in Dalton Area Drinking water.

Background

Dalton area carpet manufacturers discharge their contaminated wastewater to the sewer system and the privately owned Dalton Utilities Looper’s Bend Wastewater Treatment Plant. Although PFOA is known to cause cancer in laboratory animals, is labeled a “likely” human carcinogen, and does not breakdown in the environment, the wastewater treatment plant sprays 30 million to 40 million gallons of PFOA-containing wastewater, 87 percent of which is industrial waste, onto a 9,200-acre peninsula of forested land surrounded on three sides by the Conasauga River. It is no surprise that wastewater from the sprayfield runs into the river and seeps to groundwater that is connected to the River.

It was disappointing to learn that EPA was concerned about possible PFOA contamination associated with the carpet industry and its stain repellants in 2004 but did not pursue Dalton area monitoring because carpet industry leaders would not agree to participate. There was nothing to prevent EPA or the state agency from testing public waters without the approval or participation of the carpet manufacturers. Had this been done in 2004, the “staggeringly high” levels now being found might have been prevented.

PFOA and Other PFCs in Drinking Water

In 2005, the United Steelworkers Union (USW) began investigating PFOA at sites around the country because high levels of the chemical were found in the blood of its members and other workers. In August and October of 2006 the USW took samples of Dalton area water.

The Dalton area samples revealed the presence of PFOA and related chemicals, including PFOS, PFBA, PFPeA, PFHxA, and PFHpA. PFOA was detected at up to 6.9 parts per trillion (ppt) in all 4 samples taken from different locations served by the public drinking water system. The Dalton Public Library water had 5.5 ppt of PFOA and 10 ppt of PFOS. Samples taken from 2 out of 3 private wells revealed up to 9.7 ppt of PFOA.

In general, the samples taken from the Conasauga River by the USW were slightly lower than those found in the University Study. However, USW had limited access to the River and took only two samples.

The laboratory used for the analysis, AXYS Analytical of British Columbia, is one of the few capable of detecting PFCs. AXYS has been used by DuPont and several state environmental agencies. The results of the USW's Dalton area sampling are attached.

A USW representative met with a representative of Dalton Utilities prior to taking the samples. According to Dalton Utilities, the wastewater entering the sewer system receives only “biological” treatment before it is “applied to the landscape, allowing soil and plant life to further clean the water.” However, a fisherman and people living along the river complained of visible pollution from the sprayfield and disappearing fish populations.

The continuing and widespread problem of PFC contamination is not a problem that is being addressed by EPA's “PFOA Stewardship Program.” Although eight chemical companies agreed to reduce the chemicals in the products, including those supplied to the carpet industry and other manufacturers, the program is voluntary and unenforceable. There is no meaningful public reporting or verification of the promised progress towards eliminating the chemicals. For instance, DuPont is the only PFOA manufacturer in the United States but refuses to report the annual reductions, if any, in the amount being manufactured. Neither is there reporting of promised reductions of PFC content in stain repellants making their way to Dalton's carpet manufacturers and ultimately to public waters.

Requests for Action

We recognize that the Georgia Department of Natural Resources will begin monitoring surface water at the Conasauga River; however it has not discussed any plans to monitor groundwater or drinking water. It is not an excuse that PFOA and other PFCs are unregulated. The EPA and several state agencies have conducted such testing in response to citizen concern in other areas. For instance, the New Jersey Department of Environmental Protection tested the water supplies in 23 municipalities. After finding PFOA in 17 of the 23, the agency established a preliminary safety standard of .04 parts per billion. The agency also requires monitoring of the PFOA in the discharge permit issued to DuPont's Chambers Works Plant. After the discovery of PFCs in Minnesota drinking water sources, the Department of Health established “Health Based Values” for PFOA and PFOS in groundwater at .05 parts per billion and .03 part per billion respectively. EPA has also established PFOA limitation in West Virginia and Ohio drinking water sources as part of a Consent Decree.

While concentrations in the drinking water samples taken in the Dalton areas were in parts per trillion, there were a limited number of samples taken and concentrations may have changed over time. As EPA stated in a November 2006 Consent Order, "Because PFOA can remain in the body for a long time, drinking water that contains PFOA can, over time, produce concentrations of PFOA in blood serum that are higher than the concentrations of PFOA in the water itself."

The residents of Georgia deserve no less protection than what has been afforded to residents in other states. Accordingly, we request that the following actions be taken.

1. Drinking water and drinking water sources, including private wells near carpet manufacturing plants in the Dalton area should be tested for PFOA and related chemicals such as PFOS, PFBA, PFPeA, PFHxA, and PFHpA. For instance, PFOS is more toxic than PFOA and was found in Dalton area samples.
2. Drinking water and drinking water sources that may be hydrologically connected to the Conasauga River downstream of Dalton should be sampled for PFOA and related chemicals.
3. Discharges from the Looper's Bend Wastewater Treatment Plant should be monitored for PFOA and other PFCs.
4. Groundwater at the Looper's Bend Wastewater Treatment Plant sprayfield should be monitored for PFOA, and other PFCs.
5. EPA should examine the levels of PFOA in fish tissues and examine the toxicity of the substance to aquatic species.
6. Because Halocarbons, like PFOA, are incredibly persistent in the environment, the LAS site should be monitored for accumulations of the chemicals to see if it is on the way to becoming a RCRA site.
7. EPA should request that the manufacturers of PFOA and products containing PFOA, such as stain repellants used in carpets, report annually on promised reductions of PFC manufacture and product content.

We would appreciate a written reply to this request, which can be sent to Tracy Carluccio, Deputy Director, Delaware Riverkeeper Network, 300 Pond Street, Second Floor, Bristol, PA 19007. You may also copy your response to the following organizations.

Sincerely,

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Dalton, Georgia Water Testing

August/October 2006

Key

| | |
|------------------------------|--------------|
| Public Water System | river/stream |
| private well | |
| Dalton Public Library | |
| 1 Tilton | |
| 2 gas station | |
| 3 trailer | |
| 4 tapwater/lb | |
| 5 Private well (Colin Road) | |
| 6 Conasauga River | |
| 7 Drowning Bear Creek | |
| 8 well | |
| 9 River 2 | |

Data by Parts per Trillion (PPT)

| CLIENT ID | AXYS ID | WORKGROI | Sample Size | UNITS | #2 Tilton | #3 Gas Station | #4 Trailer | #5 Tapwater/lb | #6 Well- Colin Rd | #7 Conasauga Riv 1 | #8 Bear Creek | #9 Well | #10 Con River 2 |
|-----------|---------|----------|-------------|---------|-----------|----------------|------------|----------------|-------------------|--------------------|---------------|---------|-----------------|
| L9356-3 | L9356-4 | WG20297 | 0.502 L | ng/L | < 0.931 | < 0.935 | < 0.932 | < 0.930 | < 0.930 | 142 | 30.7 | < 0.933 | 102 |
| L9356-2 | L9356-2 | WG20297 | 0.502 L | ng/L | < 1.00 | < 1.01 | < 1.00 | 1.77 | < 1.00 | 175 | 39.5 | < 1.00 | 115 |
| PFUNA | PFUNA | PFUNA | 1.32 | < 1.15 | < 1.02 | < 1.02 | < 1.02 | < 1.02 | 45.4 | 5.45 | < 1.02 | 16 | |
| PFDOA | PFDOA | PFDOA | 4.09 | < 2.81 | 13.9 | < 1.15 | 2.2 | < 1.15 | < 1.14 | 5.51 | < 3.39 | < 1.15 | < 3.45 |
| PFBS | PFBS | PFBS | 4.09 | < 2.56 | < 2.57 | < 2.57 | < 2.57 | < 2.57 | < 2.80 | 394 | 47.4 | 14.2 | 288 |
| PFHKS | PFHKS | PFHKS | 10 | 5.1 | 3.79 | 6.13 | 9.33 | < 2.30 | < 2.56 | 70.1 | 23.2 | 10.8 | 51.5 |
| PFOS | PFOS | PFOS | 10 | < 2.87 | < 0.959 | < 0.956 | < 0.959 | < 0.953 | < 0.953 | 218 | 17.9 | < 2.30 | 664 |
| PFOSA | PFOSA | PFOSA | 10 | < 0.956 | < 0.959 | < 0.956 | < 0.959 | < 0.953 | < 0.953 | 218 | 17.9 | < 0.957 | 132 |

Data by Parts per Billion (PPB)

| CLIENT ID | AXYS ID | WORKGROI | Sample Size | UNITS | #2 Tilton | #3 Gas Station | #4 Trailer | #5 Tapwater/lb | #6 Well- Colin Rd | #7 Conasauga Riv 1 | #8 Bear Creek | #9 Well | #10 Con River 2 |
|-----------|---------|----------|-------------|---------|-----------|----------------|------------|----------------|-------------------|--------------------|---------------|---------|-----------------|
| L9356-3 | L9356-4 | WG20297 | 0.502 L | mg/L | < 0.931 | < 0.935 | < 0.932 | < 0.930 | < 0.930 | 142 | 20.7 | < 0.933 | 102 |
| L9356-2 | L9356-2 | WG20297 | 0.502 L | mg/L | < 1.00 | < 1.01 | < 1.00 | 1.77 | < 1.00 | 175 | 39.5 | < 1.00 | 115 |
| PFUNA | PFUNA | PFUNA | 1.32 | < 1.15 | < 1.02 | < 1.02 | < 1.02 | < 1.02 | 45.4 | 5.45 | < 1.02 | 16 | |
| PFDOA | PFDOA | PFDOA | 4.09 | < 2.81 | 13.9 | < 1.15 | 2.2 | < 1.15 | < 1.14 | 5.51 | < 3.39 | < 1.15 | < 3.45 |
| PFBS | PFBS | PFBS | 4.09 | < 2.56 | < 2.57 | < 2.57 | < 2.57 | < 2.57 | < 2.80 | 394 | 47.4 | 14.2 | 288 |
| PFHKS | PFHKS | PFHKS | 10 | 5.1 | 3.79 | 6.13 | 9.33 | < 2.30 | < 2.56 | 70.1 | 23.2 | 10.8 | 51.5 |
| PFOS | PFOS | PFOS | 10 | < 2.87 | < 0.959 | < 0.956 | < 0.959 | < 0.953 | < 0.953 | 218 | 17.9 | < 2.30 | 664 |
| PFOSA | PFOSA | PFOSA | 10 | < 0.956 | < 0.959 | < 0.956 | < 0.959 | < 0.953 | < 0.953 | 218 | 17.9 | < 0.957 | 132 |