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2014 DEC 30 PM 3:36

December 30, 2014

**Writer's Direct Access**
David G. Sarvadi
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sarvadi@khlaw.com

**Via Hand Delivery**

CBIC Control Number
**363196**

TSCA Confidential Business Information
Center (7407M)
Courier Deliveries:
1201 Constitution Avenue, NW
WJC East; Room 6428
Washington, DC 20004-3302

**Re: Submission of Information Concerning Allegations of Environmental Contamination**

Dear TSCA Section 8(e) Coordinator:

On behalf of Saint-Gobain Performance Plastics Corporation (SGPP), we are submitting this notice to provide information to the U.S. Environmental Protection Agency (EPA) concerning data regarding the presence of perfluorooctanoic acid (PFOA) that was detected in recent tests of the public drinking water supplies of the Village of Hoosick Falls, New York (the Village). SGPP processes fluoropolymers at a facility within the Village that were made with PFOA, but it is not and never has been a manufacturer, processor, distributor or user of PFOA *per se* anywhere in the United States. Since 2003 SGPP has participated in industry's voluntary PFOA phase-out effort by purchasing raw materials with decreasing levels of PFOA as an ingredient.

On December 12, 2014, SGPP became aware of PFOA measurements conducted by the Village in three wells used to supply drinking water to the community. The wells are located near one of our facilities in the Village. On December 15, 2014, SGPP learned of the results of the tests, and obtained a copy of the report. A copy is attached.

EPA has established a provisional health advisory (PHA) level for PFOA of 0.4 micrograms per Liter in drinking water. Even though health advisories serve as guidance only and are not enforceable, SGPP is reporting this information because the measurement from one of the wells exceeds this PHA. SGPP has been told that this one well has been removed from service, but SGPP has no further information at this time about the report, the apparent presence of PFOA in the wells, or about the laboratory that performed the tests.

SGPP has no information as to whether a significant risk of injury to human health or the environment is actually presented by the findings. Nonetheless, out of an abundance of caution

and as a matter of good product stewardship we think it prudent to submit this information to EPA under section 8(e) of the Toxic Substances Control Act (15 U.S.C. § 2601 *et seq.*).

We trust that the Agency finds this information useful. If you have any questions, please contact Lauren Alterman, Vice President – Health, Safety & Environment of Saint-Gobain Corporation (parent of Saint-Gobain Performance Plastics Corporation), at (610) 341-7838.

Respectfully submitted,

David G. Sarvadi
Counsel to Saint-Gobain

Enclosure

cc: Ms. Lauren Alterman, Saint-Gobain

12/1/14

Lab Analysis Results

EPA range is measured in micrograms per liter.
Lab analysis was measured in nanograms per liter.

micrograms per liter = ppb (parts per **billion**)
nanograms per liter = ppt (parts per **trillion**)

The EPA benchmark range converted from micrograms per liter to nanograms per liter=
0.2 - 0.4 micrograms per liter = 200 - 400 nanograms per liter.

Results from the samples to date:

| | Well 3 | Well 6 | Well 7 |
|---|---|---|---|
| Sample 1 Pre-treated: | 230 | 280 | 540 |
| Sample 2 Pre-treated: | 170 | 280 | 450 |

Sample 1 Treated = 440

Sample 2 Treated = TBD

As a result of Sample 1, well 3 replaced well 7 as the prime water supply.

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110 South Hill Street
South Bend, IN 46617
Tel: (574) 233-4777
Fax: (574) 233-8207
1 800 332 4345

# Laboratory Report

Client: Village of Hoosick Falls

Attn: Jim Hurlburt
240 Main Street
Hoosick Falls, NY 12090

Copies to: None

Report: 326785
Priority: Standard Written
Status: Final
PWS ID: Not Supplied
Lab ELAP #: 11398

**Sample Information**

| EEA ID # | Client ID | Method | Collected Date / Time | Collected By: | Received Date / Time |
|---|---|---|---|---|---|
| 3116530 | Well #3 | 537 | 10/02/14 08:35 | Client | 10/03/14 10:45 |
| 3116531 | Well #6 | 537 | 10/02/14 08:52 | Client | 10/03/14 10:45 |
| 3116532 | Well #7 | 537 | 10/02/14 08:25 | Client | 10/03/14 10:45 |

**Report Summary**

Detailed quantitative results are presented on the following pages. The results presented relate only to the samples provided for analysis.

We appreciate the opportunity to provide you with this analysis. If you have any questions concerning this report, please do not hesitate to call Nathan Trowbridge at (574) 233-4777.

*Note: This report may not be reproduced, except in full, without written approval from EEA.*

C. E. Manager

Digitally signed by Nathan Trowbridge
Date: 2014.10.16 11:37:33 -04'00'

Authorized Signature | Title | Date

Client Name: Village of Hoosick Falls
Report #: 326785

Client Name: Village of Hoosick Falls

Report #: 326785

Sampling Point: Well #3

PWS ID: Not Supplied

| EEA Methods | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Analyte ID # | Analyte | Method | Reg Limit | MRL† | Result | Units | Preparation Date | Analyzed Date | EEA ID # |
| 375-73-5 | Perfluorobutanesulfonic acid (PFBS) | 537 | — | 90 | < 90 | ng/L | 10/08/14 07:40 | 10/09/14 09:02 | 3116530 |
| 375-85-9 | Perfluoroheptanoic acid (PFHpA) | 537 | — | 10 | < 10 | ng/L | 10/08/14 07:40 | 10/09/14 09:02 | 3116530 |
| 355-46-4 | Perfluorohexanesulfonic acid (PFHxS) | 537 | — | 30 | < 30 | ng/L | 10/08/14 07:40 | 10/09/14 09:02 | 3116530 |
| 375-95-1 | Perfluorononanoic acid (PFNA) | 537 | — | 20 | < 20 | ng/L | 10/08/14 07:40 | 10/09/14 09:02 | 3116530 |
| 1763-23-1 | Perfluorooctane sulfonate (PFOS) | 537 | — | 40 | < 40 | ng/L | 10/08/14 07:40 | 10/09/14 09:02 | 3116530 |
| 335-67-1 | Perfluorooctanoic acid (PFOA) | 537 | — | 20 | 230 | ng/L | 10/08/14 07:40 | 10/09/14 09:02 | 3116530 |

Sampling Point: Well #6

PWS ID: Not Supplied

| EEA Methods | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Analyte ID # | Analyte | Method | Reg Limit | MRL† | Result | Units | Preparation Date | Analyzed Date | EEA ID # |
| 375-73-5 | Perfluorobutanesulfonic acid (PFBS) | 537 | — | 90 | < 90 | ng/L | 10/08/14 07:40 | 10/09/14 09:33 | 3116531 |
| 375-85-9 | Perfluoroheptanoic acid (PFHpA) | 537 | — | 10 | < 10 | ng/L | 10/08/14 07:40 | 10/09/14 09:33 | 3116531 |
| 355-46-4 | Perfluorohexanesulfonic acid (PFHxS) | 537 | — | 30 | < 30 | ng/L | 10/08/14 07:40 | 10/09/14 09:33 | 3116531 |
| 375-95-1 | Perfluorononanoic acid (PFNA) | 537 | — | 20 | < 20 | ng/L | 10/08/14 07:40 | 10/09/14 09:33 | 3116531 |
| 1763-23-1 | Perfluorooctane sulfonate (PFOS) | 537 | — | 40 | < 40 | ng/L | 10/08/14 07:40 | 10/09/14 09:33 | 3116531 |
| 335-67-1 | Perfluorooctanoic acid (PFOA) | 537 | — | 20 | 280 | ng/L | 10/08/14 07:40 | 10/09/14 09:33 | 3116531 |

Sampling Point: Well #7

PWS ID: Not Supplied

| EEA Methods | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Analyte ID # | Analyte | Method | Reg Limit | MRL† | Result | Units | Preparation Date | Analyzed Date | EEA ID # |
| 375-73-5 | Perfluorobutanesulfonic acid (PFBS) | 537 | — | 90 | < 90 | ng/L | 10/08/14 07:40 | 10/09/14 10:04 | 3116532 |
| 375-85-9 | Perfluoroheptanoic acid (PFHpA) | 537 | — | 10 | 10 | ng/L | 10/08/14 07:40 | 10/09/14 10:04 | 3116532 |
| 355-46-4 | Perfluorohexanesulfonic acid (PFHxS) | 537 | — | 30 | < 30 | ng/L | 10/08/14 07:40 | 10/09/14 10:04 | 3116532 |
| 375-95-1 | Perfluorononanoic acid (PFNA) | 537 | — | 20 | < 20 | ng/L | 10/08/14 07:40 | 10/09/14 10:04 | 3116532 |
| 1763-23-1 | Perfluorooctane sulfonate (PFOS) | 537 | — | 40 | < 40 | ng/L | 10/08/14 07:40 | 10/09/14 10:04 | 3116532 |
| 335-67-1 | Perfluorooctanoic acid (PFOA) | 537 | — | 20 | 540 | ng/L | 10/08/14 07:40 | 10/09/14 13:41 | 3116532 |

† EEA has demonstrated it can achieve these report limits in reagent water, but can not document them in all sample matrices.

| Reg Limit Type: | MCL | SMCL | AL |
|---|---|---|---|
| Symbol: | * | ^ | ! |

## Lab Definitions

Continuing Calibration Check Standard (CCC) / Continuing Calibration Verification (CCV) / Initial Calibration Verification Standard (ICV) / Initial Performance Check (IPC) - is a standard containing one or more of the target analytes that is prepared from the same standards used to calibrate the instrument. This standard is used to verify the calibration curve at the beginning of each analytical sequence, and may also be analyzed throughout and at the end of the sequence. The concentration of continuing standards may be varied, when prescribed by the reference method, so that the range of the calibration curve is verified on a regular basis.

Internal Standards (IS) - are pure compounds with properties similar to the analytes of interest, which are added to field samples or extracts, calibration standards, and quality control standards at a known concentration. They are used to measure the relative responses of the analytes of interest and surrogates in the sample, calibration standard or quality control standard.

Laboratory Duplicate (LD) - is a field sample aliquot taken from the same sample container in the laboratory and analyzed separately using identical procedures. Analysis of laboratory duplicates provides a measure of the precision of the laboratory procedures.

Laboratory Fortified Blank (LFB) / Laboratory Control Sample (LCS) - is an aliquot of reagent water to which known concentrations of the analytes of interest are added. The LFB is analyzed exactly the same as the field samples. LFBs are used to determine whether the method is in control.

Laboratory Method Blank (LMB) / Laboratory Reagent Blank (LRB) - is a sample of reagent water included in the sample batch analyzed in the same way as the associated field samples. The LMB is used to determine if method analytes or other background contamination have been introduced during the preparation or analytical procedure. The LMB is analyzed exactly the same as the field samples.

Laboratory Trip Blank (LTB) / Field Reagent Blank (FRB) - is a sample of laboratory reagent water placed in a sample container in the laboratory and treated as a field sample, including storage, preservation, and all analytical procedures. The FRB/LTB container follows the collection bottles to and from the collection site, but the FRB/LTB is not opened at any time during the trip. The FRB/LTB is primarily a travel blank used to verify that the samples were not contaminated during shipment.

Matrix Spike Duplicate Sample (MSD) / Laboratory Fortified Sample Matrix Duplicate (LFSMD) - is a sample aliquot taken from the same field sample source as the Matrix Spike Sample to which known quantities of the analytes of interest are added in the laboratory. The MSD is analyzed exactly the same as the field samples. Analysis of the MSD provides a measure of the precision of the laboratory procedures in a specific matrix.

Matrix Spike Sample (MS) / Laboratory Fortified Sample Matrix (LFSM) - is a sample aliquot taken from field sample source to which known quantities of the analytes of interest are added in the laboratory. The MS is analyzed exactly the same as the field samples. The purpose is to demonstrate recovery of the analytes from a sample matrix to determine if the specific matrix contributes bias to the analytical results.

Quality Control Standard (QCS) / Second Source Calibration Verification (SSCV) - is a solution containing known concentrations of the analytes of interest prepared from a source different from the source of the calibration standards. The solution is obtained from a second manufacturer or lot if the lot can be demonstrated by the manufacturer as prepared independently from other lots. The QCS sample is analyzed using the same procedures as field samples. The QCS is used as a check on the calibration standards used in the method on a routine basis.

Reporting Limit Check (RLC) / Initial Calibration Check Standard (ICCS) - is a procedural standard that is analyzed each day to evaluate instrument performance at or below the minimum reporting limit (MRL).

Surrogate Standard (SS) / Surrogate Analyte (SUR) - is a pure compound with properties similar to the analytes of interest, which is highly unlikely to be found in any field sample, that is added to the field samples, calibration standards, blanks and quality control standards before sample preparation. The SS is used to evaluate the efficiency of the sample preparation process.



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South Bend, IN 46617
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1 800 332 4345

# Laboratory Report

Client: Village of Hoosick Falls

Attn: Jim Hurlburt
240 Main Street
Hoosick Falls, NY 12090

Report: 328480
Priority: Standard Written
Status: Final
PWS ID: Not Supplied
Lab ELAP #: 11398

Copies to: None

**Sample Information**

| EEA ID # | Client ID | Method | Collected Date / Time | Collected By: | Received Date / Time |
|---|---|---|---|---|---|
| 3133280 | Water Plant Finished Water | 537 | 11/04/14 08:45 | Client | 11/05/14 09:45 |
| 3133281 | Well #7 Raw Water | 537 | 11/04/14 09:05 | Client | 11/05/14 09:45 |
| 3133282 | Well #3 Raw Water | 537 | 11/04/14 09:40 | Client | 11/05/14 09:45 |
| 3133283 | Well #6 Raw Water | 537 | 11/04/14 10:10 | Client | 11/05/14 09:45 |

**Report Summary**

Detailed quantitative results are presented on the following pages. The results presented relate only to the samples provided for analysis.

We appreciate the opportunity to provide you with this analysis. If you have any questions concerning this report, please do not hesitate to call Nathan Trowbridge at (574) 233-4777.

*Note: This report may not be reproduced, except in full, without written approval from EEA.*

C. E. Manager

Digitally signed by Nathan Trowbridge
Date: 2014.11.21 10:01:35 -05'00'

Authorized Signature | Title | Date

Client Name: Village of Hoosick Falls

Report #: 328480

Sampling Point: Water Plant Finished Water

PWS ID: Not Supplied

| EEA Methods | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Analyte ID # | Analyte | Method | Reg Limit | MRL† | Result | Units | Preparation Date | Analyzed Date | EEA ID # |
| 375-73-5 | Perfluorobutanesulfonic acid (PFBS) | 537 | — | 90 | < 90 | ng/L | 11/10/14 07:30 | 11/11/14 04:19 | 3133280 |
| 375-85-9 | Perfluoroheptanoic acid (PFHpA) | 537 | — | 10 | 10 | ng/L | 11/10/14 07:30 | 11/11/14 04:19 | 3133280 |
| 355-46-4 | Perfluorohexanesulfonic acid (PFHxS) | 537 | — | 30 | < 30 | ng/L | 11/10/14 07:30 | 11/11/14 04:19 | 3133280 |
| 375-95-1 | Perfluorononanoic acid (PFNA) | 537 | — | 20 | < 20 | ng/L | 11/10/14 07:30 | 11/11/14 04:19 | 3133280 |
| 1763-23-1 | Perfluorooctane sulfonate (PFOS) | 537 | — | 40 | < 40 | ng/L | 11/10/14 07:30 | 11/11/14 04:19 | 3133280 |
| 335-67-1 | Perfluorooctanoic acid (PFOA) | 537 | — | 20 | 440 | ng/L | 11/10/14 07:30 | 11/11/14 14:06 | 3133280 |

Sampling Point: Well #7 Raw Water

PWS ID: Not Supplied

| EEA Methods | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Analyte ID # | Analyte | Method | Reg Limit | MRL† | Result | Units | Preparation Date | Analyzed Date | EEA ID # |
| 375-73-5 | Perfluorobutanesulfonic acid (PFBS) | 537 | — | 90 | < 90 | ng/L | 11/10/14 07:30 | 11/11/14 04:50 | 3133281 |
| 375-85-9 | Perfluoroheptanoic acid (PFHpA) | 537 | — | 10 | 10 | ng/L | 11/10/14 07:30 | 11/11/14 04:50 | 3133281 |
| 355-46-4 | Perfluorohexanesulfonic acid (PFHxS) | 537 | — | 30 | < 30 | ng/L | 11/10/14 07:30 | 11/11/14 04:50 | 3133281 |
| 375-95-1 | Perfluorononanoic acid (PFNA) | 537 | — | 20 | < 20 | ng/L | 11/10/14 07:30 | 11/11/14 04:50 | 3133281 |
| 1763-23-1 | Perfluorooctane sulfonate (PFOS) | 537 | — | 40 | < 40 | ng/L | 11/10/14 07:30 | 11/11/14 04:50 | 3133281 |
| 335-67-1 | Perfluorooctanoic acid (PFOA) | 537 | — | 20 | 450 | ng/L | 11/10/14 07:30 | 11/11/14 14:37 | 3133281 |

Sampling Point: Well #3 Raw Water

PWS ID: Not Supplied

| EEA Methods | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Analyte ID # | Analyte | Method | Reg Limit | MRL† | Result | Units | Preparation Date | Analyzed Date | EEA ID # |
| 375-73-5 | Perfluorobutanesulfonic acid (PFBS) | 537 | — | 90 | < 90 | ng/L | 11/10/14 07:30 | 11/11/14 05:20 | 3133282 |
| 375-85-9 | Perfluoroheptanoic acid (PFHpA) | 537 | — | 10 | < 10 | ng/L | 11/10/14 07:30 | 11/11/14 05:20 | 3133282 |
| 355-46-4 | Perfluorohexanesulfonic acid (PFHxS) | 537 | — | 30 | < 30 | ng/L | 11/10/14 07:30 | 11/11/14 05:20 | 3133282 |
| 375-95-1 | Perfluorononanoic acid (PFNA) | 537 | — | 20 | < 20 | ng/L | 11/10/14 07:30 | 11/11/14 05:20 | 3133282 |
| 1763-23-1 | Perfluorooctane sulfonate (PFOS) | 537 | — | 40 | < 40 | ng/L | 11/10/14 07:30 | 11/11/14 05:20 | 3133282 |
| 335-67-1 | Perfluorooctanoic acid (PFOA) | 537 | — | 20 | 170 | ng/L | 11/10/14 07:30 | 11/11/14 05:20 | 3133282 |

Client Name: Village of Hoosick Falls

Report #: 328480

Sampling Point: Well #6 Raw Water

PWS ID: Not Supplied

| EEA Methods | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Analyte ID # | Analyte | Method | Reg Limit | MRL† | Result | Units | Preparation Date | Analyzed Date | EEA ID # |
| 375-73-5 | Perfluorobutanesulfonic acid (PFBS) | 537 | — | 90 | < 90 | ng/L | 11/10/14 07:30 | 11/11/14 05:51 | 3133283 |
| 375-85-9 | Perfluoroheptanoic acid (PFHpA) | 537 | — | 10 | < 10 | ng/L | 11/10/14 07:30 | 11/11/14 05:51 | 3133283 |
| 355-46-4 | Perfluorohexanesulfonic acid (PFHxS) | 537 | — | 30 | < 30 | ng/L | 11/10/14 07:30 | 11/11/14 05:51 | 3133283 |
| 375-95-1 | Perfluorononanoic acid (PFNA) | 537 | — | 20 | < 20 | ng/L | 11/10/14 07:30 | 11/11/14 05:51 | 3133283 |
| 1763-23-1 | Perfluorooctane sulfonate (PFOS) | 537 | — | 40 | < 40 | ng/L | 11/10/14 07:30 | 11/11/14 05:51 | 3133283 |
| 335-67-1 | Perfluorooctanoic acid (PFOA) | 537 | — | 20 | 280 | ng/L | 11/10/14 07:30 | 11/11/14 05:51 | 3133283 |

† EEA has demonstrated it can achieve these report limits in reagent water, but can not document them in all sample matrices.

| Reg Limit Type: | MCL | SMCL | AL |
|---|---|---|---|
| Symbol: | * | ^ | ! |

## Lab Definitions

**Continuing Calibration Check Standard (CCC) / Continuing Calibration Verification (CCV) / Initial Calibration Verification Standard (ICV) / Initial Performance Check (IPC)** - is a standard containing one or more of the target analytes that is prepared from the same standards used to calibrate the instrument. This standard is used to verify the calibration curve at the beginning of each analytical sequence, and may also be analyzed throughout and at the end of the sequence. The concentration of continuing standards may be varied, when prescribed by the reference method, so that the range of the calibration curve is verified on a regular basis.

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**Matrix Spike Sample (MS) / Laboratory Fortified Sample Matrix (LFSM)** - is a sample aliquot taken from field sample source to which known quantities of the analytes of interest are added in the laboratory. The MS is analyzed exactly the same as the field samples. The purpose is to demonstrate recovery of the analytes from a sample matrix to determine if the specific matrix contributes bias to the analytical results.

**Quality Control Standard (QCS) / Second Source Calibration Verification (SSCV)** - is a solution containing known concentrations of the analytes of interest prepared from a source different from the source of the calibration standards. The solution is obtained from a second manufacturer or lot if the lot can be demonstrated by the manufacturer as prepared independently from other lots. The QCS sample is analyzed using the same procedures as field samples. The QCS is used as a check on the calibration standards used in the method on a routine basis.

**Reporting Limit Check (RLC) / Initial Calibration Check Standard (ICCS)** - is a procedural standard that is analyzed each day to evaluate instrument performance at or below the minimum reporting limit (MRL).

**Surrogate Standard (SS) / Surrogate Analyte (SUR)** - is a pure compound with properties similar to the analytes of interest, which is highly unlikely to be found in any field sample, that is added to the field samples, calibration standards, blanks and quality control standards before sample preparation. The SS is used to evaluate the efficiency of the sample preparation process.



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