ENVIRONMENTAL CONSULTING & MANAGEMENT
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November 15, 2013

Erica Bergman
NJDEP - Bureau of Case Management
401 E. State Street - Mail Code 401-05
P.O. Box 420
Trenton, NJ 08625-0420

Re: Perfluorocarbon Compound Usage
Solvay West Deptford Plant
10 Leonard Lane
West Deptford, New Jersey 08096

Dear Ms. Bergman:

As the Licensed Site Remediation Professional (LSRP) retained by Solvay Specialty Polymers, I have reviewed the attached Perfluorocarbon Usage spreadsheet (Spreadsheet) for the Solvay West Deptford Plant and I am submitting it on behalf of Solvay Specialty Polymers. Enclosed are three copies of the Spreadsheet for you internal distribution. Please feel free to contact Mitch Gertz with any questions.

Sincerely,

Thomas R. Buggey, LSRP #580659
Principal Hydrogeologist

Cc: Mitch Gertz – Solvay
Phil Goodrum – Integral
Nidal Azzam – USEPA (via email)

West Deptford Plant PFC Usage and Emissions

Year [a]	Surflon Used [b] (kg)	Surflon Emissions [c] (kg)					NaPFO Used (kg)	NaPFO Emissions [c] (kg)			
		Air [d]	Water [d]	Landfill [e]	Products [d]	Destroyed [f]		Air [d]	Water [d]	Landfill [e]	Products [f]
1991	4,375	1,171	2,624	88	493	0	0	0	0	0	0
1992	3,714	994	2,227	74	418	0	0	0	0	0	0
1993	3,292	881	1,974	66	371	0	0	0	0	0	0
1994	3,940	1,054	2,363	79	444	0	0	0	0	0	0
1995	5,228	1,399	3,135	105	589	0	0	0	0	0	0
1996	5,832	1,561	3,498	117	657	0	429	34	382	9	4
1997	9,098	2,435	5,456	182	1,025	0	1,773	142	1,578	35	18
1998	7,952	2,128	4,769	159	896	0	525	42	467	11	5
1999	6,683	1,788	4,008	134	753	0	2,169	174	1,930	43	22
2000	7,100	1,900	4,258	142	800	0	2,747	220	2,445	55	27
2001	7,953	2,128	4,770	159	896	0	1,547	124	1,377	31	15
2002	7,549	2,020	4,527	151	851	0	878	70	781	18	9
2003	8,226	2,201	4,933	165	927	0	496	40	441	10	5
2004	8,659	2,317	5,193	173	976	0	0	0	0	0	0
2005	6,946	1,859	4,166	139	783	0	0	0	0	0	0
2006	7,081	1,895	4,247	142	798	0	0	0	0	0	0
2007	8,467	2,266	5,078	169	954	0	0	0	0	0	0
2008	6,341	1,697	3,803	127	714	0	0	0	0	0	0
2009	6,462	1,729	3,596	130	727	280	0	0	0	0	0
2010	171	46	106	3	16	0	0	0	0	0	0
2011	0	0	0	0	0	0	0	0	0	0	0
2012	0	0	0	0	0	0	0	0	0	0	0

Notes:

NaPFO = sodium perfluorooctanoate

[a] Data prior to 1991 during Pennwalt/AtoChem ownership are not available in Solvay Specialty Polymers records.

[b] Usage data are estimated from production and accounting records.

[c] Emissions data are estimated using engineering calculations.

[d] Estimated from analyses of process samples and mass balance equations.

[e] Estimated based on historical patterns of solid waste generation rather than analysis of samples.

[f] Estimated from quantity of liquid waste collected for incineration.