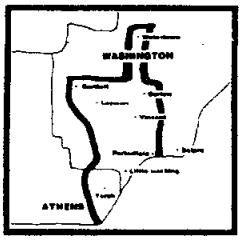

LITTLE HOCKING WATER ASSOCIATION, INC.

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U.S. EPA PUBLIC SCIENCE ADVISORY PANEL PERFLUOROOCTANOIC ACID (PFOA) RISK ASSESSMENT REVIEW PANEL February 22-23, 2005

COMMENTS

THE LITTLE HOCKING WATER ASSOCIATION, INC. LITTLE HOCKING, OHIO

Good morning everyone. My name is Bob Griffin. I want to thank the Science Advisory Board for this opportunity to comment. I am a civil engineer, who is the general manager of a non-profit rural water system located in southeast Ohio. The Little Hocking Water Association serves approximately 12,000 people. Our water wells are located along the Ohio River directly across from DuPont's Washington Works plant in Wood County, West Virginia, where C-8 is used in the fluoropolymer manufacturing process and where telomers are also produced.

Our community has been exposed to this chemical for more than 50 years. Although DuPont knew our water was contaminated with C-8 in 1984, we were not informed until January of 2002. In the interim, we were unwittingly exposed to this chemical and perhaps related chemicals. Since January 2002, we have learned that it is not only in our water, but it also contaminates our soil and the air that we breathe.

Further, we know that this chemical is "persistent" – for thousands of years.

We are here today to put a face on the individuals that are directly affected by your technical review and conclusions. We are here to ask that you conduct your deliberations so that individual people and public health principles are not forgotten in the data that you will review. We are also here to provide background information that may assist you in visualizing the impact that C-8 exposure has on our customers. People in our community and other communities along the Ohio River are drinking water every day with C-8 in it, without truly knowing the long-term health effects to them, their children, grandchildren, and future generations.

We do know that the chemical crosses the placental barrier.

In June of 2003, I spoke to the first Plenary session of the USEPA PFOA Enforceable Consent Agreement Process. At that time, I told that body that our water system had the highest level of C-8 contamination of any public water supply in the United States, if not the world. To the best

of my knowledge, that is still true. In a little more than a year and a half, the C-8 level in the water being delivered to our customers has more than tripled...from 2.0 ppb to 7.2 ppb. In December of 2001 one of our production wells had a C-8 level of 7.69 ppb; in November of last year this same well had 18.6 ppb - in spite of reported air emission reductions by industry. Levels of C-8 as high as 78.0 ppb have been detected in the water in our wellfield.

We have voluntarily chosen not to use the well with the highest level of C-8 in order to minimize exposure to our customers. As a result, we have been operating our wellfield at less than optimum efficiency. This pumping arrangement leaves us no opportunity to perform maintenance on the remaining wells. It also endangers our ability to have enough capacity to adequately serve our customers' needs. Our options for future planning considerations have been severely limited by the presence of C-8 in our water.

As we have endeavored to ascertain the consequences of the exposure, not only to us, but also to our children and grandchildren, we have been confounded by the ever-changing guidelines for exposure to C-8. In the late 1980's or early 1990's, DuPont developed a community exposure guideline of 1.0 ppb. In March of 2002, as part of a consent order between Regions III and V of the USEPA, alternate water was to be provided if the C-8 levels in drinking water exceeded 14.0 ppb. In August of 2002, working under a West Virginia consent order, a panel developed a health protective screening level of 150 ppb based on exposure through drinking water only. In November of 2002, the State of Minnesota developed a health based value for C-8 of 7.0 ppb in drinking water, which takes into account exposure routes other than water. Clearly, there is no agreement on what the safe level of C-8 is for drinking water. Because of the uncertainties surrounding a safe level of C-8 in drinking water and assertions by the Environmental Working Group and others that exposure to C-8 may pose potential human health risks, we have been compelled to inform our customers that they utilize and drink our water at their own risk.

Further environmental testing performed to date in the vicinity of Little Hocking has only reported results for C-8. We do not know what other related perfluorinated chemicals are present in our wellfield. However, we do know that perfluorinated compounds have carbon lengths ranging from C4 to C16. It is our understanding that some of these different chain lengths may also pose potential health threats. As you review the data before you, we ask you to question whether or not cumulative risk and/or synergistic effects would change or alter your conclusions. Please remember that exposure to C-8 alone may not encompass the complete picture.

In summary, please remember that we are concerned with:

1) an industrial chemical about which there is very limited scientific data;
2) the "acceptable" level of that chemical in drinking water;
3) the fact that much of the scientific and medical data that does exist is ominous; and
4) the fact that synergistic interactions are not remotely understood.

As a consequence, we urge that the panel put public health first by applying the Precautionary Principle to your most conservative risk assessment guess.

This would require at least a two order of magnitude reduction of the level that is determined by your risk assessment process.

Thank you for carefully considering the comments of the Little Hocking Water Association.