



CITY OF TONAWANDA, NEW YORK

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March 13, 2015

Honorable Gina McCarthy
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460

Honorable Gina McCarthy,

I respectfully request that the EPA objects to the DuPont Yerkes Title V (Permit ID 9-1464-00031/00292). According to the DEC website, the "Department has prepared a draft permit and has made a tentative determination to approve this application." Constituents throughout the City of Tonawanda have serious concerns regarding this permit renewal that could affect their quality of life and welfare.

Tonawanda is home to the highest concentration of major industrial facilities in New York State with over 50 air permitted facilities within a two-mile radius. In 2007, the NYS DEC undertook an extensive air monitoring project with support from the US EPA that found elevated levels of six hazardous air pollutants. I strongly encourage the EPA to reference the "2007 Tonawanda Community Air Quality Study." The results of this particular study recommended "further compliance monitoring and **regulatory actions** to reduce the risk associated with exposures to air pollution in the Tonawanda Community." Today, the DEC continues to monitor the affected areas as a direct result of the perseverance of the community and the desire to improve the quality of life in the surrounding areas.

The facility is located in a neighborhood where the average income of households living adjacent to the DuPont Yerkes is approximately \$11,000 a year. In 2013, the New York State Department of Health (NYSDOH) released the Tonawanda Community Health Study. The study found statistically significant levels of cancers among both men and women. The study also found elevated levels of negative birth outcomes including; pre-term births and heart defects in the neighborhood where the facility is located.

According to the EPA's toxic release inventory, the Yerkes plant emitted 201,239 pounds of methyl methacrylate and 36,400 pounds of vinyl fluoride in 2013. The company also emits dimethyl acetamide (DMAC). As you are aware, all three of these chemicals cause serious health effects.

The EPA found DuPont Yerkes in violation of the Clean Air Act and the Emergency Planning and Community Right to know Act in 2013 and 2014. In addition to severe environmental violations and issues of non-compliance, DuPont has violated other safety and health procedures. The U.S. Chemical Safety Board (CSB) determined that an explosion that killed one employee and injured another on November 9, 2010 was caused by the ignition of flammable vinyl fluoride inside a large process tank. The CSB also determined that the primary cause of the blast was the failure of the company to require that the

interior of storage tanks (which hot water work is to be performed) is to be monitored for flammable vapor.

As an elected representative in the City of Tonawanda, I am deeply concerned about the amount of toxic emissions released from this facility. We should all have a strong interest in assessing ongoing environmental emissions, public health matters, and worker safety concerns at every plant; including the Yerkes plant. Protecting the health and safety of the residents in the City of Tonawanda and affected areas is my number one concern. It is my position that this facility should be held to the same standard as other permitted facilities and not be given any special accommodations or permits.

The DuPont permit renewal has been sent to the EPA. The deadline for the EPA review process is Monday March 16, 2015. I respectfully request that the EPA object to this permit and work alongside the DEC to install the appropriate technology at this facility to **reduce** emissions.

I appreciate your consideration. If I can be of any assistance please contact me at 716-692-3070.

Respectfully,

A handwritten signature in black ink, appearing to be 'Jenna N. Koch', with a stylized, flowing script.

Jenna N. Koch
City of Tonawanda
4th Ward Councilmember