# EXHIBIT S36 TO DECLARATION OF STEPHEN G. SCHWARZ IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

# C-8 IN OFF-PLANT WATER SYSTEMS

- NONE DETECTED IN UPSTREAM PUBLIC WATER SYSTEM.
- NONE DETECTED IN WASHINGTON WORKS' DRINKING WATER.
- DETECTABLE LEVELS FOUND IN TWO DOWNSTREAM PUBLIC WATER SYSTEMS.

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### C-8 PROGRAM

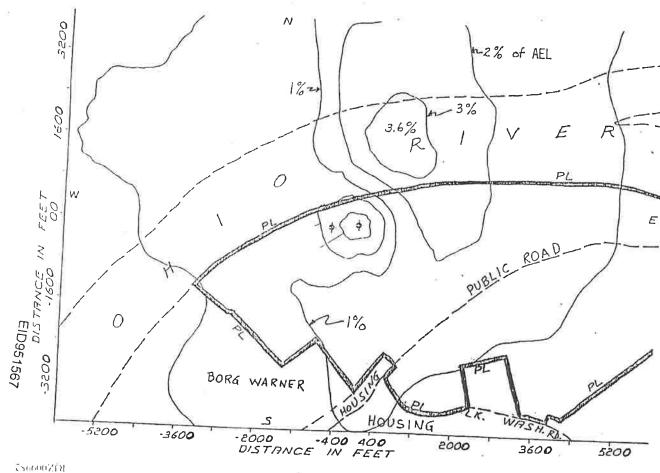
### WATER

- REPLACE C-8 WITH TBSA IN FEP PROCESS.
- PARTITIONS WITH PRODUCT NOT WATER.
- DECOMPOSES TO PRESUMED INNOCUOUS BY-PRODUCT IN HUMID HEAT TREATING OVEN. VENTED TO ATMOSPHERE.
- TBSA PROJECT AUTHORIZED FOR CHAMBERS WORKS. START-UP 11/84.
- SWITCH COMPLETE MID 1985.

### AIR

STUDY ABATEMENT BY ENGINEERING CHANGES.

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## ENGINEERING STUDY RESULTS

### THERMAL DESTRUCTION

- ECONOMICS \$1MM + INVESTMENT

\$1MM ANNUAL OPERATING COST
(APPROXIMATELY \$0.15/LB. OF PRODUCT)

- TIMING 1 1/2 TO 2 1/2 YEARS

# SCRUBBING AND RECOVERY

- ECONOMICS \$3.5MM + INVESTMENT

\$1.5MM DEVELOPMENT COST

\$2.5MM ANNUAL OPERATING COST (APPROXIMATELY \$0.40/LB. OF PRODUCT) BUT

POTENTIAL BREAK-EVEN IF RECOVERED

C-8 IS USABLE

- TIMING 4-5 YEARS

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# CONCLUSIONS

- NO KNOWN HEALTH EFFECTS AT CURRENT LEVELS
- THIRTY YEARS EXPERIENCE CONCERN ABOUT LONGER RANGE
- POTENTIAL LIABILITY
  - THIRD PARTY LAWSUITS
  - ADVERSE PRESS

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### **PROGRAMS**

### WATER

- PURSUE CONVERSION TO TBSA
- DETERMINE DISPOSITION OF C-8 IN SUPERNATE TO CHAMBERS WORKS

### AIR

- DEFINE EVOLUTION OF C-8 IN DRYER
- PURSUE FINE POWDER DRYER SLIPSTREAM INCINERATION
- TOTAL DRYER AIR STREAM INCINERATION: DIRECT/BOILER
- PURSUE DRYER EXHAUST SCRUBBING AND RECOVERY (4-5 YEARS)

DISPERSION PRODUCT = KEEP CUSTOMERS FULLY INFORMED

BLOOD DONATIONS - ALLOW TO CONTINUE

FOLLOW 3M STUDIES

CONTINUE TO ADVISE SISTER PLANTS OF CUR ACTIVITIES

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