SOUTHERN WATER CONSULTANTS, INC.

Water Treatment Solutions for a Better World

January 13, 2009

Mr. Michael Hom U.S. Environmental Protection Agency Clean Water Enforcement Branch 61 Forsyth Street, S.W. Atlanta, GA 30303-8960

Re: Information Request- Section 308 of the Clean Water Act Discharge of Perfluorinated Compounds

Dear Mr. Hom:

This correspondence is being sent in response to the EPA's request for information concerning perfluorinated compounds as set forth in Enclosure A of your letter dated December 16, 2008.

In reference to Enclosure A, item:

- 1. Southern Water Consultants Inc. (SWC) product lines include cooling water treatments, boiler water treatments, coagulants and flocculants for waste treatment applications and potable water applications, potable water corrosion inhibitors, and cleaning products for various applications. SWC is a basic manufacturer of aluminum chlorhydrate and polyaluminum chloride.
- 2. SWC's SIC code is 2899, the primary NAICS code is 325188, and the secondary NAICS code is 325998.
- 3. SWC has no record of PFC's being present in any raw material used or finished good manufactured at our facility since 1996.
- 4. SWC has no record of PFC's being present in any raw material or finished good that is or has been used or manufactured at our Decatur, Alabama location. Therefore, we have no MSD sheets to present.
- 5. No, SWC has never used PFC's in its operations to manufacture products or provide services at our Decatur, Alabama facility.
- 6. No, SWC has never used telomers or fluoropolymers in its operations to manufacture products or provide services at our Decatur, Alabama facility.
- 7. SWC manufacturing operations produce no by-products. SWC manufacturing operations produce 1 waste stream which consist of non contact cooling water. The source of the cooling water is city supplied potable water and is utilized as a single pass non contact heat transfer fluid and discharged into the Decatur Utilities sanitary sewer collection system.
- 8. SWC's only waste stream is non contact cooling water. It is discharged into the Decatur Utilities sanitary sewer collection system.

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- 9. Since the only waste stream SWC produces is non contact potable water, there is no pollution abatement or pretreatment process utilized at our facility in Decatur, Alabama.
- 10. SWC does not have any analytical data or monitoring results indicating the presence of PFC's or fluoride in the wste streams from our Decatur, Alabama location.
- 11. SWC has not been required to obtain a permit, contract, or agreement to discharge into the Decatur Utilities sanitary sewer system.
- 12. SWC has not performed any monitoring or sampling of ambient air, surface water, groundwater or soil for PFC's at and around our Decatur, Alabama location.

Please accept this information as our request for information concerning the discharge of perfluorinated compounds. Please contact Jeremy Phillips, Plant Manager, if you have any questions or need additional information.

Sincerely,

John P. Peters President Southern Water Consultants, Inc.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

John P. Peters, President

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