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July 8, 2024

Florida Department of Environmental Protection
Aquifer Protection Program
Attention: Richard Lobinske, Ph.D.
Division of Water Resource Management
Aquifer Protection Program
Environmental Administrator
2600 Blair Stone Rd. MS#3530
Tallahassee, FL 32399

Re: Permit Renewal Application for UIC Permit No. 01150-010-012-UO/II
FDEP WACS No. 2222
Ascend Performance Materials Operations LLC

Via email: Richard.Lobinske@floridadep.gov; CC: Elizabeth.Orr@dep.state.fl.us;
James.Dodson@floridadep.gov

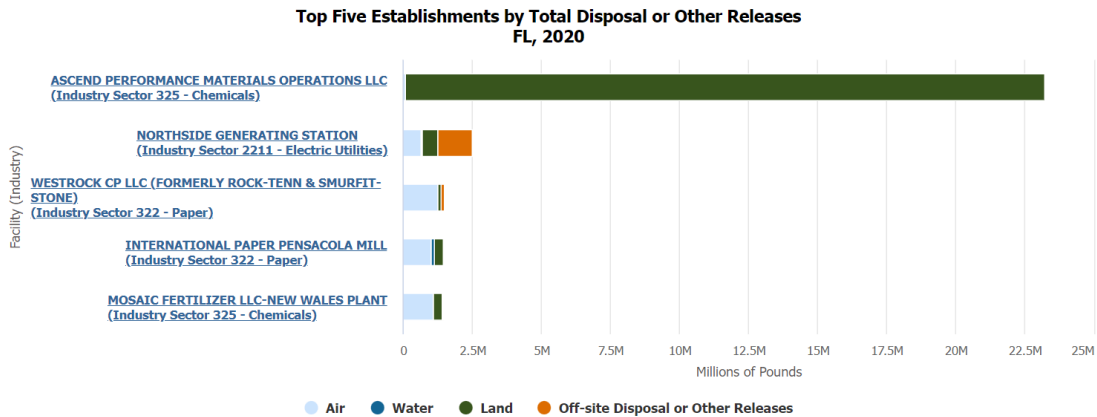
Dear Dr. Lobinske

Healthy Gulf is a nonprofit organization whose purpose is to collaborate with and serve communities who love the Gulf of Mexico by providing the research, communications, and coalition-building tools needed to reverse the long pattern of over exploitation of the Gulf's natural resources. One of our priority focus areas is on protecting and restoring the quality of ground and surface waters that flow to the Gulf of Mexico.

On behalf of our members and supporters in Florida, we wish to comment on the Draft Permit for UIC Permit No. 01150-010-012-UO/II, Ascend Performance Materials Operations LLC in Cantonment, FL. We repeat our request first made in March 2022, for the Department to hold a public hearing on the Draft Permit. The Draft Permit notes the availability of a public hearing to be held on the Draft Permit.

We request that the public hearing be held in Pensacola in order to gather input and better educate the community on the operations of this facility and how they could impact public health and the environment. This hearing should take place prior to any final decision by the Department on the renewal of the permit. In support of this request, we offer the following information:

- 1) This facility has long been a source of concern and confusion in the local community due to the tremendous volume of discharges that are the subject of this UIC permit renewal request. Since USEPA began annual reporting of the Toxics Release Inventory (TRI) with the year 1987, the large volume of discharge from this facility has routinely placed Escambia County, FL among the top counties in the nation for the release of TRI chemicals. Additionally, the Ascend facility is by far the top discharger of TRI chemicals in the state of Florida:



This fact has been widely reported in local media for decades, leading to tremendous public concern that the County's air and water are heavily polluted and public health is in jeopardy.

- 2) In 2009 the Emerald Coast Utilities Authority (ECUA) filed suit in U.S. District Court against the previous owners of the Ascend facility (Solutia) in the case of EMERALD COAST UTILITIES AUTHORITY, Plaintiff, v. 3M COMPANY, E.I. DuPont De Nemours and Company, Solutia, Inc., and Fire Ram International, Inc., Defendants. The suit sought damages for costs related to ECUA wells where groundwater contains the fluorinated chemicals perfluorooctanoic acid (PFOA) and perfluorooctane sulfonate (PFOS), which were alleged to have been tested at the Ascend facility. News reports on this case have fueled public concern that drinking water supplies could be contaminated and public health placed at risk by the Ascend facility.

A public hearing in which the applicant and Department present facts and answer questions about this facility and the Draft Permit would help the public better understand the operations and impacts of the facility. Providing information to the public is a vital part of the Department's duty to keep the public well-informed on issues of concern, and a public hearing will do that in a way that the Department's limited formal process of notifications and permit information does not do. We further request that such a hearing be held during evening hours in order to maximize the ability of the public to fully engage in the process.

Thank you for considering our comments.

For a healthy Gulf,

Coastal organizer, FL - AL