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DuPont Haskell Laboratory
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DuPont Haskell Laboratory

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June 23, 2000

PR 37148

Dr. Charles M. Auer, Director
U.S. Environmental Protection Agency
Office of Pollution Prevention and Toxics
Chemical Control Division
401 M Street NW, Room 403
Washington, D.C. 20460

COMPANY SANITIZED

Dear Dr. Auer:

As you requested in your April 19, 2000 letter and during our subsequent meeting on May 1, 2000, attached is a summary of DuPont's U.S. uses of Ammonium Perfluorooctanoate (APFO, CAS# 3825-26-1) as a fluoropolymer reaction aid including releases from DuPont site and the fate of APFO in fluoropolymer dispersion products, a summary of industrial hygiene data collected at our U.S. fluoropolymer manufacturing site, and a summary of the employee blood data from a site in the U.S. A summary of the toxicology available to DuPont was sent under separate cover on May 26, 2000.

It is important to emphasize the following points:

- DuPont does not manufacture APFO. All APFO used in our processes as a reaction aid is purchased from an outside supplier.
- Most of the APFO used is removed from the fluoropolymer products before they are sold to outside customers. A relatively small amount of APFO (worldwide, in the U.S.) leaves DuPont facilities in fluoropolymer dispersion products.
- Of the APFO in the products sold, most (>97%) is destroyed during customer processing to a non-carboxylated hydrofluorocarbon.
- All of the U.S. DuPont operations that use APFO with significant exposure potential are concentrated at one location; Washington Works in Washington, WV. Therefore, most of the industrial hygiene data and blood serum data presented in this document are from that location.

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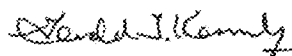
Dr. Charles M. Auer, Director
U.S. Environmental Protection Agency

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- Extensive industrial hygiene data collected on workers potentially exposed to APFO show airborne exposures to be significantly below the ACGIH TLV of $0.01\text{mg}/\text{m}^3$ 8 hr. TWA. Exposure levels of plant workers have dropped significantly since the conversion to an APFO solution from a dry powder.
- As part of the ongoing surveillance of workers potentially exposed to APFO, in March and April of this year a series of blood samples were taken from workers in the U.S., The Netherlands and Japan to be analyzed for serum APFO concentration. DuPont has not received the results from our contract laboratory at this time. DuPont will submit a summary of the results when they become available.

The format of the information in the attached is a modified UEIP format. If you wish to discuss the information contained in the attachment, please contact Robert F. Pinchot at (302) 999-4074 or e-mail at Robert.F.Pinchot@usa.dupont.com or me at (302) 366-5259.

Very truly yours,



Gerald L. Kennedy
Director, Applied Toxicology
and Health