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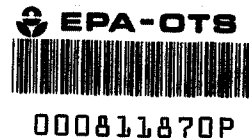
January 26, 2004

FEDERAL EXPRESS

Richard H. Hefter, Chief
High Production Volume Chemicals Branch
U.S. Environmental Protection Agency
Office of Pollution Prevention and Toxics
1201 Constitution Avenue, N.W.
Room 6334AA
Washington, DC 20004

Document Processing Center (7407M)
EPA East - Room 6428 Attn: Section 8(e)
U.S. Environmental Protection Agency
Office of Pollution Prevention and Toxics
1201 Constitution Avenue, N.W.
Washington, DC 20004

Re: TSCA Section 8(e) Reporting For PFOA



Dear Mr. Hefter:

This letter serves as a supplement to our letters of July 3, and July 31, 2003, in connection with the referenced matter providing additional information relating to the extent of E.I. duPont de Nemours and Company's ("DuPont's") knowledge of health effects related to exposure to ammonium perfluorooctanoate (a/k/a APFO/PFOA/FC-143/C-8) at the time that DuPont obtained the pregnancy outcome and drinking water contamination information referenced in our July 3, 2003, letter. Our July 3, 2003, letter provided information that included DuPont's knowledge of certain data relating to the level of PFOA detected by DuPont in the blood of employees at its Washington Works Plant in West Virginia during 1981. Our July 31, 2003, letter provided additional information relating to DuPont's knowledge of levels of PFOA detected by DuPont in human blood through testing conducted prior to 1981. DuPont previously provided to USEPA some limited information within its possession relating to its sampling for PFOA in the blood of its Washington Works employees between 1984 and 2000 in letters to Dr. Charles M. Auer, Director of USEPA's Office of Pollution, Prevention and Toxics, dated June 23, 2000, and January 25, 2001. (Extra copies enclosed at Exhibits A and B)^{1/}

^{1/} After your office reviewed DuPont's submissions to Dr. Auer and asked DuPont in a letter dated February 14, 2001, to explain why its PFOA blood results were not reported earlier under

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Because it is not clear whether DuPont has previously produced to USEPA the data it possesses with respect to PFOA levels detected by DuPont after 1980 in the blood of humans other than DuPont's Washington Works' employees, we have enclosed additional documents relating to DuPont's analysis of PFOA in human blood samples generated between 1981 and 1984, along with additional information relating to PFOA blood sampling in certain non-DuPont employees generated in 2001 (Onyx Contractors who performed services at DuPont's Washington Works Plant). The following documents are enclosed at Exhibit G:

1. 1/23/81 - DuPont Washington Works C-8 Blood Results (EID713815-6) (names redacted);
2. 3/27/81 - DuPont Memo Re: Status Of C-8 Blood Testing Program (EID096494-5);
3. 4/5/81 - DuPont Memo Re: Washington Works C-8 Blood Sampling Program (EID079541);
4. 4/7/81 - DuPont Memo Re: Airborne C-8 Concentrations And Organic Fluorine In Blood Samples (EID080710-1);
5. 4/10/81 - DuPont Memo Re: Fluorosurfactants In Blood (EID079219);
6. 4/13/81 - DuPont Memo Re: APFO (FC-143) Ongoing Program (EID079607-12);
7. 4/81 - DuPont Memo Re: Outline Of C-8 Blood Sampling Program (EID090073-75);
8. 4/28/81 - DuPont Memo Re: 0.4 ppm Acceptable C-8 Blood Level (EID096481);

Section 8(e) of TSCA, (extra copy enclosed at Exhibit C), DuPont responded in a letter dated March 8, 2001, that the "blood serum information provided in the DuPont submissions is not indicative of information not known to the Agency." (Extra copy enclosed at Exhibit D) In response, you requested in a letter dated March 20, 2001, that DuPont forward to you "a copy of the entire data set of blood concentrations summarized" in DuPont's prior submissions. (Extra copy enclosed at Exhibit E) In response, DuPont provided limited additional data relating to PFOA blood sampling results for its Washington Works Plant between 1984 and 1995. (*See* Exhibit F)

9. 5/6/81 - DuPont Memo Re: Proposal To Lower Acceptable C-8 Blood Level To 0.004 ppm (4 ppb) (EID096478-80)
10. 5/14/81 - DuPont Washington Works C-8 Blood Results (EID713817-19) (names redacted);
11. 5/14/81 - DuPont Chambers Works C-8 Blood Results (EID713820) (name redacted);
12. 5/14/81 - DuPont Charts Re: C-8 Blood Testing Results (EID090084-5);
13. 5/15/81 - DuPont CR&D Haskell Laboratory C-8 Blood Results (EID713821-2) (names redacted);
14. 5/19/81 - DuPont Spruance, Virginia C-8 Blood Results (EID713827-9) (names redacted);
15. 5/19/81 - DuPont Washington Works C-8 Blood Results (EID713825-26) (names redacted);
16. 5/19/81 - DuPont Washington Works C-8 Blood Results (EID713823-4) (names redacted);
17. 5/20/81 - DuPont Washington Works C-8 Blood Results (EID713834-5) (names redacted);
18. 5/20/81 - DuPont Chestnut Run C-8 Blood Results (EID713832-3) (names redacted);
19. 5/20/81 - DuPont Circleville, Ohio C-8 Blood Results (EID713836-7) (names redacted);
20. 5/20/81 - DuPont Fairfield, Connecticut C-8 Blood Samples (EID713830-1) (names redacted)
21. 5/21/81 - DuPont AJAX, Ontario C-8 Blood Samples (EID713838-9) (names redacted);
22. 6/5/81 - DuPont Memo Re: Program To Monitor Level Of Organic Fluorine (Measured As C-8) In Blood (EID080707-9);

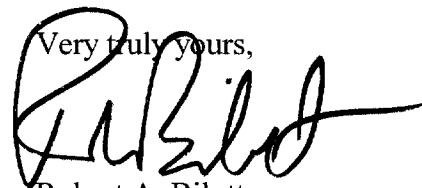
23. 7/13/81 - DuPont Mechelen, Belgium C-8 Blood Results (EID713842-3) (names redacted);
24. 7/13/81 - DuPont Photo Products Rochester, New York C-8 Blood Results (EID713840-1) (names redacted);
25. 7/16/81 - DuPont Washington Works C-8 Blood Results (EID713849-50) (names redacted);
26. 7/16/81 - DuPont C-8 Blood Results Reported To Wilmington, Delaware (EID713844-6) (names redacted);
27. 7/16/81 - DuPont Spruance, Virginia C-8 Blood Results (EID713851-3) (names redacted);
28. 7/16/81 - DuPont Photo Products Brevard, North Carolina C-8 Blood Results (EID713854-5) (names redacted);
29. 7/16/81 - DuPont Dordrecht, Netherlands C-8 Blood Results (EID713847-8) (names redacted);
30. 7/20/81 - DuPont Washington Works C-8 Blood Results (EID713856-7) (names redacted);
31. 7/24/81 - DuPont Spruance, Virginia C-8 Blood Results (EID713858-9) (names redacted);
32. 7/28/81 - DuPont Fairfield, Connecticut C-8 Blood Results (EID713860) (name redacted);
33. 7/31/81 - DuPont Memo Re: C-8 Blood Sampling Program (EID510244-51);
34. 8/7/81 - DuPont Memo Re: C-8 Blood Sampling Program (EID079552-3);
35. 8/19/81 - DuPont Blood Results Reported To Wilmington, Delaware (EID713861-2) (names redacted);
36. 8/21/81 - DuPont Washington Works C-8 Blood Results (EID713863-5) (names redacted);

37. 8/27/81 - DuPont Chart Re: C-8 Blood Results - Chambers Works, New Jersey (EID110665);
38. 9/1/81 - DuPont Memo Re: Communication Of C-8 Blood Results To DuPont Chambers Works, New Jersey Employees (EID110659-64);
39. 9/8/81 - DuPont Washington Works C-8 Blood Results (EID713866-8) (names redacted);
40. 9/15/81 - DuPont Memo Re: Proposed DuPont C-8 Blood Sampling Program For Employees At Shimizu, Japan (EID079371-5);
41. 9/81 - DuPont Memo Re: C-8 In Blood Transparencies (EID080743-7);
42. 9/29/81 - DuPont Washington Works C-8 Blood Results (EID713869-71) (names redacted);
43. 10/6/81 - DuPont Washington Works C-8 Blood Results (EID713872-4)(names redacted);
44. 10/20/81 - DuPont Washington Works C-8 Blood Results (EID713875-6) (names redacted);
45. 10/27/81 - DuPont Washington Works C-8 Blood Results (EID713877-9) (names redacted);
46. 11/3/81 - DuPont Washington Works C-8 Blood Results (EID713880-82) (names redacted);
47. 12/1/81 - DuPont Memo Re: C-8 Blood Levels In Females Transferred Out Of The Teflon® Divisions: Washington Works (EID080677-92);
48. 12/2/81 - DuPont Washington Works C-8 Blood Results (EID713883-5) (names redacted);
49. 12/2/81 - DuPont Circleville, Ohio C-8 Blood Results (EID713886-7) (names redacted);

50. 1/6/82 - DuPont Washington Works C-8 Blood Results (EID713888-90) (names redacted);
51. 1/18/82 - DuPont Washington Works C-8 Blood Results (EID713891-3) (names redacted);
52. 2/19/82 - DuPont Memo Re: Trends In Blood C-8 Levels For Various Teflon® Operating Groups: Washington Works (EID079349-52);
53. 4/5/82 - DuPont Memo Re: Blood Tests - Employees Potentially Exposed To C-8 (EID096456);
54. 5/12/82 - DuPont Memo Re: 3M Method For Analysis Of Blood Serum For C-8 (EID072179-81);
55. 5/12/82 - DuPont Memo Re: Fluoride In Blood Related To HFPO (EID096455);
56. 7/6/82 - DuPont Memo Re: C-8 Blood Sampling Program (EID087880);
57. 7/14/82 - DuPont Memo Re: Trends In Blood C-8 Levels For Various Teflon® Employee Groups (EID079049-57);
58. 7/14/82 - DuPont Memo Re: C-8 Air And Blood Sampling (EID082729-31);
59. 7/29/82 - DuPont Memo Re: Retention Of C-8 In Blood Of Teflon® Employees (EID079294-6);
60. 8/6/82 - DuPont Memo Re: Retention Of C-8 In Employees' Blood (EID080662);
61. 8/6/82 - DuPont Memo Re: C-8 Blood Sampling Program (EID080657);
62. 8/25/82 - DuPont Memo Re: C-8 In Human Blood (EID072164-6);
63. 9/28/82 - DuPont Memo Re: C-8 In Blood Of Teflon® Employees (EID080637-44);
64. 10/7/82 - DuPont Memo Re: C-8 Elimination Rates (EID080633);
65. 11/1/82 - DuPont Memo Re: C-8 Blood Sampling Results (USEPA10530-1);

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66. 3/4/83 - DuPont Memo Re: Proposed C-8 Blood Testing (EID096447);
67. 8/11/83 - DuPont Memo Re: Update On C-8 Blood Sampling Program (EID079277-81);
68. 9/21/83 - DuPont Tralee Park C-8 Blood Tests Results (USEPA10528-9) (names redacted);
69. 10/17/83 - DuPont Notes Re: C-8 Blood Test And Air Results (EID080614-21);
70. 10/19/83 - DuPont Charts Re: C-8 Blood Sample Results (EID079746-49);
71. 10/27/83 - DuPont Memo Re: Washington Works C-8 Blood Levels For Non-Fluoropolymers Division Employees (EID080612-3);
72. 5/23/84 - DuPont Memo Re: C-8 Meeting Summary - Wilmington, Delaware (EID602999-3010);
73. 6/84 - DuPont Charts Re: Assessment Of C-8 Liability Issues (EID951565-70);
74. 6/14/84 - DuPont Memo Re: Update On C-8 Blood Sampling Program (EID080543-611);
75. 9/12/84 - DuPont Memo Re: C-8 Blood Sampling Program (EID080591-2);
76. 6/12/87 - DuPont Memo Re: Establishing Acceptable Exposure Level For C-8 In Blood (EID079034);
77. 6/25/87 - DuPont Memo Re: Acceptable C-8 Blood Exposure Level And Acceptable Community Exposure Level For C-8 In Water (EID078779-80); and
78. 1/22/02 - DuPont Memo Re: 2001 Washington Works C-8 Blood Results And Onyx Contractor C-8 Blood Results (EDD0030054).

Very truly yours,

Robert A. Bilott

RAB:mdm
Enclosures

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cc: Mary Dominiak (USEPA-OPPT) (for inclusion in AR-226 and
OPPT-2003-0012) (w/ encls.)
Jennifer Seed (USEPA-OPPT) (w/ encls.)
R. Edison Hill, Esq. (w/o encls.)
Larry A. Winter, Esq. (w/o encls.)