

MR 45 204

AR 226-0604

DuPont Haskell Laboratory  
for Toxicology and Industrial Medicine  
Elkton Road, P.O. Box 50  
Newark, DE 19714-0050



DuPont Haskell Laboratory

FYI-0500-1378

May 2, 2000

Mr. Charles M. Auer, Director  
U. S. Environmental Protection Agency  
Office of Pollution Prevention & Toxics  
Chemical Control Division  
401 M Street, N.W. - Room 403  
Washington, D.C. 20460

ORIGINAL

RECEIVED  
OPT/NCIC  
2000 JUL 13 AM 8:46

Dear Mr. Auer:

Our thanks to you and the other participants in our May 1 meeting in Washington. Steve Korzeniowski and I appreciated the opportunity to discuss and understand your request for information about PFOS, PFOA and other perfluorinated carboxylic and sulfonic acids. Likewise, we hope our dialog has provided you with a better understanding of DuPont's products and Telomer chemistry.

To briefly recap, DuPont does not manufacture or convert PFOS-based ECF intermediate products. DuPont does not manufacture PFOA, although we do purchase and use it as a surfactant in making fluoropolymers. DuPont does manufacture "Telomer-based" products. As we presented, Telomer-based materials are structurally and chemically different than ECF-based materials. In addition, we shared biopersistence-screening data on Telomer-based products which showed a difference of the Telomer products biopersistence relative to PFOS. We also overviewed the body of toxicology information we have for Telomer-based materials.

We will provide the information we have regarding exposure, environmental and toxicology of PFOS, PFOA and any other perfluorinated sulfonic or carboxylic acids to the agency as requested. Specifically, we will provide toxicity testing information on PFOS, PFOA and perfluorononanoic acid by May 26, 2000. Concerning ammonium PFOA, we will provide a summary of U.S. employee exposure information, historical use and release information from U.S. DuPont facilities by compartment, and a summary of releases that may result from the industrial use of our products. Although we hope to provide you with this information by your requested date of May 26, 2000, we will more likely need at least until June 23, 2000, to gather and summarize this type of information. Our understanding is that you are interested only in perfluorinated materials at this time; therefore we will not plan to include information on our Telomer-based materials.

Thank you again for providing us with a clear understanding of the agency's concerns, needs and direction. We appreciate the opportunity to have open and direct dialog with you and look forward to working together in the future.

Very truly yours,

*Gerald L. Kennedy*  
Gerald L. Kennedy  
Director, Applied Toxicology  
and Health



85010000010



FYI-00-001378