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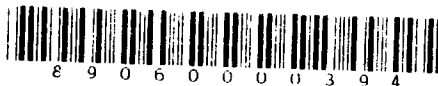
DuPont Haskell Laboratory
for Health and Environmental Sciences
Elkton Road, P.O. Box 50
Newark, DE 19714-0050

July 28, 2006

VIA FEDERAL EXPRESSTSCA Document Processing Center (7407M)
EPA East – Room 6428
Attn: Section 8(e)/FYI
U.S. Environmental Protection Agency
1201 Constitution Avenue, NW
Washington, D.C. 20004-3302
Phone: 202-564-8940

CONTAIN NO CBI

Dear 8(E) Coordinator:

**Re: Perfluorooctanoic Acid (PFOA)**
Updated Occupational Blood Monitoring Information

In a transmission dated March 27, 2006, DuPont submitted updated occupational PFOA blood monitoring information to the above-identified office. This current submission, titled the same as the March 27th submission, provides results from Axys Analytical Services ("Axys") for analysis of occupational serum samples.

Attachment 1 provides occupational serum sample results received from Axys. DuPont typically uses Exygen Laboratories to analyze blood serum samples for PFOA. DuPont randomly selected 20 blood serum samples, from employees at three different DuPont plant sites, for analysis at Axys to compare results with those reported by Exygen.¹ Although DuPont requested analysis only for PFOA, the samples were analyzed by Axys for 12 additional substances. Sample results for PFOA in the random sample group ranged from 7.71 ng/mL to 2630 ng/mL, which are generally corroborative of previously reported occupational levels.²

The PFOA levels reported by Axys were consistently within $\pm 20\%$ of those reported by Exygen for the same samples. The quality control fortification results obtained by Axys were acceptable, but there was only one quality control sample done at a single level for the entire set. DuPont is not aware of any additional method validation data for analytes

¹ 6 samples (plus 1 duplicate) were from the DuPont Fayetteville Works facility in Fayetteville, North Carolina; 4 samples were from the DuPont Washington Works facility in Parkersburg, West Virginia; and 7 samples (plus 2 duplicates) were from the DuPont Chambers Works facility in Deepwater, New Jersey.

² The ng/ml unit is approximately equal to ppb; however, the ng/mL unit is the more accurate of the two units since the blood serum was sampled for analysis on a volume basis.

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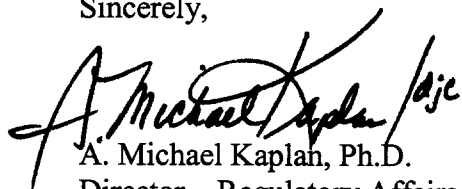
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other than PFOA. Therefore, DuPont cannot attest to the reliability of the data for the other analytes reported by Axys.

In Attachment 2, serum sample results from Axys for 16 substances are provided for one employee at the DuPont Chambers Works facility in Deepwater, New Jersey. This sampling was not undertaken by DuPont and as such, DuPont cannot attest to the validity of any of the information provided in Attachment 2. Attachment 2 was provided to DuPont by the employee whose test results are provided in the document.

Due to the uncertainties mentioned above concerning the information provided in the Axys reports, a meaningful evaluation of these results has not, to date, been possible. However, in view of the Agency's continued interest in perfluorinated substances, DuPont is submitting this information to the TSCA 8(e) office.

Sincerely,

A handwritten signature in black ink, appearing to read "A. Michael Kaplan /ajc".

A. Michael Kaplan, Ph.D.

Director – Regulatory Affairs and Occupational Health

(302) 366-5260

Attachments

- Index (1 page)
- Attachment 1 (3 pages)
- Attachment 2 (3 pages)

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INDEX OF ATTACHMENTS

attachment	description	no. of pages
1	Axys Analytical Services results on 17 serum samples – descriptor page and 2 page table summary	3
2	Axys Analytical Services results on 1 serum sample – Form 1A and Form 2	2