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12 May 2006

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VIA OVERNIGHT MAIL

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EPA East - Room 6428
Attn: Section 8(e)/FYI
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1201 Constitution Avenue, NW
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2006 MAY 19 PM 2:15

**Re: Perfluorooctanoate Well Sampling Results
Penns Grove Water Supply Company
Carneys Point Township, Salem County, New Jersey**

Dear Sir/Madam:

Please find enclosed a copy of a letter, with its Attachments, submitted by DuPont to the New Jersey Department of Environmental Protection (NJDEP) reporting initial perfluorooctanoate (PFOA) analytical results for samples collected from the above-identified water supply company.

As stated in the letter, the results reflect PFOA levels far below any established regulatory guidance for drinking water. While DuPont does not believe that the information provided with this submittal is indicative of substantial risk, DuPont is providing this information in light of the Agency's continued interest in perfluorinated substances.

A copy of this submission is also provided on CD, for your convenience.

Very truly yours,

Andrea V. Malinowski



Enclosures: Letter dated May 10, 2006 from DuPont to NJDEP with Attachments (44 pages)
1 CD (identified as May 12, 2006 Submission - PFOA Well Sampling Results; Penns Grove)



295638



May 10, 2006

Eileen Murphy, Director
NJDEP
Policy, Planning and Science
Division of Science, Research & Technology
P.O. Box 409
401 East State Street, 1st Floor
Trenton NJ 08625-0409

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06 MAY 16 AM 6:14

**RE: Penns Grove Water Supply Company
Water Supply Well Sampling Results
Carneys Point Township, Salem County, New Jersey**

Dear Ms Murphy:

This letter transmits the initial analytical results of samples collected from Penns Grove Water Supply Company wells located in Carneys Point Township, Salem County, New Jersey. On February 27, 2006, DuPont sampled four wells that supply water to households in Penns Grove and Carneys Point. Two of the wells were located in the Layton Well Field, near the A. Clemente Inc. plant site. The other two were located in the Route 48 Well Field, near Penns Grove High School.

Samples were collected from a shallow well (between 60 and 70 feet deep) and a deep well (between 350 and 400 feet deep) at each of the two well fields. A trip blank and field blank were also submitted with the samples. Samples were submitted to two separate laboratories (Exygen Research Inc. of State College, Pennsylvania and Axys Analytical Services Ltd. of British Columbia, Canada) for analysis of thirteen different perfluorinated compounds. Please note that there is no standard analytical method for this measurement approved by any governmental agency or testing organization. A subsequent aliquot of the sample submitted to Exygen Research Inc. was analyzed on April 20th for perfluorooctanoate (PFOA) only using the method validated according to US FDA criteria (Guidance for Industry).

As discussed more fully in Attachment A, analytical results for PFOA were variable between the laboratories and methods. In the two deep wells, PFOA was not found in the water at detectable concentrations by either laboratory. In the two shallower wells PFOA was reported at concentrations ranging from 37.8 to 123 parts per trillion (ng/L) in the Route 48 well field and from 57 to 190 ng/L in the Layton well field. PFOA concentrations (average of laboratory duplicate analysis) based on the validated method were 98.6 and 190 ng/L in the shallow wells at the Route 48 and Layton well fields, respectively.

Ms. Eileen Murphy
May 10, 2006
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The analytical data reports are presented in Attachment B. The full laboratory data deliverables for the thirteen perfluorinated compounds are undergoing data validation review and will be submitted separately upon completion of that review. The analytical data package for PFOA determination by the validated analytical method has undergone review for data quality parameters and were considered final on April 24. This data package will also be submitted separately.

The results reflect PFOA levels far below any established regulatory guidance for drinking water. We believe, therefore, that the water we tested for PFOA is safe for human consumption.

To put the results in numerical perspective: A part per trillion is a thousand times smaller than a part per billion and a million times smaller than a part per million.

A class action lawsuit recently filed against DuPont implies that 50 parts per trillion is an unacceptable level of PFOA in drinking water. In fact, that number is neither a public health standard nor a threshold for obtaining compensation through litigation.

Despite the fact that PFOA is not a regulated chemical, we have dramatically reduced emissions of PFOA from our facilities. We already have reduced emissions 95 percent from our U.S. manufacturing facilities since 2000. In addition, DuPont has developed technologies which will substantially eliminate PFOA content in its products and emissions from its manufacturing facilities by 2007.

Thank you for your attention. We will continue to update our employees, our community and the NJDEP on developments related to PFOA and the local drinking water supply. In the meantime, if you have any questions please contact me at (856) 540-3438 or the letterhead address.

Sincerely,



Cynthia N. McManus
Environmental Manager

Attachments

- c G. Zeigler, Penns Grove Water Supply Company
- K. Fell, NJDEP
- F. Faranca, NJDEP
- File