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August 4, 2005

Via Federal Express

8EHQ-0805-0394

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Attention: 8(e) Coordinator
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
1201 Constitution Ave., NW
Washington, DC 20460

8EHQ-81-394

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Dear 8(e) Coordinator:

8EHQ-0381-0394
Ammonium Perfluorooctanoate

This letter is being submitted as a supplement to information we communicated to the Agency on January 10, 2005. This evaluation is part of an ongoing study, "Ammonium Perfluorooctanoate: Cross-Sectional Surveillance Of Clinical Measures of General Health Status Related to a Serum Biomarker of Exposure and Retrospective Cohort Mortality Analyses in a Polymer Production Plant" of over 1,000 employees at our Washington Works plant.

As described in communications to the Agency on January 10, 2005, study participants were divided into four categories based on job histories:

Assignment	Number	Median PFOA (ppm)
1. Currently working in PFOA areas	259	0.49
2. Formerly worked in PFOA areas	264	0.20
3. Occasionally works in PFOA areas	160	0.18
4. Never assigned to PFOA areas	342	0.11

Study participants' current residences were plotted on a map of Wood County, WV and Washington County, OH by category level of serum PFOA, using EPI INFO software and geocoding based on the U.S. Census TIGER database. The PFOA serum level categories (in ppm) were:

- from 0 to <0.1
- from 0.1 to <0.5
- from 0.5 to <1.0
- from 1.0 to <5.0
- from 5.0 to <10.0



No clear associations between serum level and proximity to plant site were apparent in the initial plot of all study participant residences by measured PFOA serum level category and whether they ever worked in a job division that had likely potential for exposure. However, when only current addresses of employees that were never assigned to divisions with likely potential for PFOA exposure were plotted on the map, 6 of the 7 individuals with serum levels in the highest category for this group (between 0.5 and 1.0 ppm) lived within 5 miles of the plant site. Five of these seven individuals lived in a NNE direction from the plant (Ohio), the direction consistent with the prevailing winds of the area, and one individual currently resides west of the plant site (Ohio). The seventh individual in this group lives in the town of Parkersburg, W.V., approximately 10 miles from the plant. We emphasize that not all possible exposure sources have been identified and analyzed.

When the residences of all study participants were plotted by relative exposure groups, (differences between individual measured PFOA serum level and the median value for their jobs expressed as percentages of the median value), participants with the highest relative values (i.e., people in the high end of the range of PFOA serum levels for their job) appeared equally distributed within and outside the 5-mile radius from the plant. However, participants in the lower relative exposure groups were much more likely to be found outside the 5-mile radius.

A copy of the final report of the larger ongoing study referred to above will be submitted to the Agency when available.

Sincerely,

A handwritten signature in black ink, reading "A. Michael Kaplan". The signature is fluid and cursive, with the first name "A." and last name "Kaplan" clearly legible.

A. Michael Kaplan, Ph.D.

Director – Regulatory Affairs and Occupational Health

AMK/RWR/RCL: clp
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