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NORTHERN KENTUCKY OFFICE
SUITE 340
1717 DIXIE HIGHWAY
COVINGTON, KENTUCKY 41011-4704
606-331-2838
513-381-2838
FAX: 513-381-6613

DAYTON, OHIO OFFICE
SUITE 900
110 NORTH MAIN STREET
DAYTON, OHIO 45402-1786
937-228-2838
FAX: 937-228-2816

TAFT, STETTINIUS & HOLLISTER LLP

425 WALNUT STREET, SUITE 1800
CINCINNATI, OHIO 45202-3957

513-381-2838
FAX: 513-381-0205

www.taftlaw.com

CLEVELAND, OHIO OFFICE
3500 BP TOWER
200 PUBLIC SQUARE
CLEVELAND, OHIO 44114-2302
216-241-2838
FAX: 216-241-3707

COLUMBUS, OHIO OFFICE
21 EAST STATE STREET
COLUMBUS, OHIO 43215-4221
614-221-2838
FAX: 614-221-2007

ROBERT A. BILOTT
(513) 357-9638
bilott@taftlaw.com

August 6, 2003

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Richard H. Hefter, Chief
High Production Volume Chemicals Branch
U.S. Environmental Protection Agency
Office of Pollution Prevention and Toxics
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460-0001

Document Processing Center (7407M)
EPA East - Room 6428 Attn: Section 8(e)
U.S. Environmental Protection Agency
Office of Pollution Prevention and Toxics
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460-0001

Re: TSCA Section 8(e) Reporting For PFOA

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Dear Mr. Hefter:

As a further supplement to our July 3 and July 31 letters on the referenced topic relating to DuPont's knowledge of information concerning the relationship between C-8 exposure and birth defects of the eye, we have enclosed a copy a December 23, 1999, report entitled "Tennant Farm Herd Health Investigation: Cattle Team Report" (EID151682-802, DUP004-62). (See Exhibit A) This report identifies certain eye defects observed among adult cattle and their calves who consumed water from the Dry Run Creek^{1/}, which USEPA had found in 1997 to be

^{1/} Although the Cattle Team summarily categorized all of the "corneal ulcers, scars and opacities, as well as blepharospasm" observed in the cattle as "'pinkeye', an infectious keratoconjunctivitis caused by bacteria such as Morexella bovis," (Exhibit A., at EID151693), there is no mention of any actual positive clinical test results for "pinkeye" in any of the cattle tested, and the only actual clinical investigation of any of the eye problems at issue performed by the Ohio Department of Agriculture two years earlier during a histopathologic examination of two "cloudy eyes" of "a dead six-month-old bull calf" revealed lesions that the pathologist noted could be caused by "inborn errors of metabolism." (Id., at EID151747) The pathologist also noted that the "ulcerating and suppurative keratitis associated with Morexella was not observed in this case." (Id.)



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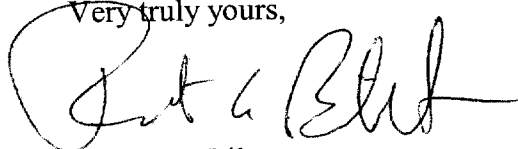
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Richard Hefter
August 6, 2003
Page 2

potentially-impacted by chemicals released from DuPont's Dry Run Landfill in Wood County, West Virginia. (See Exhibit B) Although there was no mention or analysis of C-8 in the 1999 Cattle Team Report, which was co-authored by DuPont, it was subsequently revealed that DuPont had detected C-8 in the Dry Run Creek at levels as high as 1.9 parts per million as early as 1990 (see Exhibit C), after DuPont had dumped over 7,000 tons of C-8 contaminated sludge into the unlined Dry Run Landfill in 1988 (see Exhibit D). All of these documents, along with additional information regarding the timing and extent of DuPont's knowledge of C-8 contamination at the Dry Run Creek, health effects claims made to DuPont relating to those conditions, and DuPont's knowledge of the level of C-8 in various drinking water supplies, including drinking water at its own Washington Works Plant, are included among the attachments to our March 6, 2001, letter to USEPA, which is available in USEPA's Administrative Record for PFOA at AR-226-1246.

Very truly yours,



Robert A. Bilott

RAB:mdm

Enclosures

cc: Dr. Charles M. Auer (USEPA OPPT) (w/o encls.) (letter by telecopy)
Mary Dominiak (USEPA OPPT) (for inclusion in AR-226) (w/ encls.) (letter by telecopy)
Jennifer Seed (USEPA) (w/ encls.) (letter by telecopy)
R. Edison Hill, Esq. (w/ encls.)
Larry A. Winter, Esq. (w/ encls.)
Gerald J. Rapien, Esq. (w/o encls.)