

Date: Sat, 30 Aug 2003 07:17:34 -0500

>To: Charlie Auer, steve.johnson@epamail.epa.gov

>From: rich purdy <rpurdy@pressenter.com>

>Subject: postponing of risk assessment.

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>I heard that EPA is postponing the final risk assessment for PFOA and Science Advisory Board meeting from this fall until next spring because industry is doing another study. If this is true, it is outrageous. PFOA is obviously causing harm now as part of the perfluorinated acid family. Your draft risk assessment on PFOA shows that it presents too much risk by itself, even without considering additivity with other family members, which means the risk is worse than your assessment on just PFOA indicates.

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> Postponing is a normal industry tactic. They continue with multi billion-dollar sales per year and millions in profit each day. The current managers at the corporations push off the falling of the axe until after they retire or leave. There was a recent court decision against Monsanto. The monetary level was about 700 million dollars. By my calculations that is less than the yearly profit for manufacturers of telomers and those who use PFOA. The longer they postpone action, they longer they make profits and set them aside for settlements. Dupont's philosophy can be seen in the May 22, 1984 memo from J.A. Schmid to T.M. Kemp, T.L Schrenk and R.E. Putnam in which a meeting on the recent detection of C-8 in Little Hocking, OH, and Lubeck, WV, water systems was discussed. Applying the logic in that memo to today's issues: Since duPont has polluted the environment for 50-odd years, they cannot become any more liable. So what's a few more years of pollution. Especially, if they are pulling in hundreds of millions in profits each year.

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>We see in the PFOA Environmental Consent Agreement meetings the same dragging of feet. Industry refuses to discuss looking at blood levels, soil levels, levels in fish, levels in mammals, levels in vegetation, levels of isomers or homologs that indicate source of pollution, etc. The experts in the room say that is what is needed, and industry's managers and lawyers say no. By the way why are there 5 managers and lawyers to every one industry scientist at these "technical" workgroup meetings?

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>EPA is not doing its job. Postponement means more children with birth defects, more developing asthma, more developing early onset diabetes, and who knows what else. PFOA and its family of chemicals are causing more health problems than any other industrial chemical. And it lasts forever. We do not even know yet if equilibrium has been reached. We are likely to continue accumulating higher and higher levels in our blood and livers for years and maybe decades even if all production and release were to halt tomorrow.

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>You have to stop this crime from continuing. Regulate now and stop allowing Industry to postpone the day of judgment until after you retire, too. You told 3M your concerns, they realized the error of their ways and halted production of PFOA and other members of the family. You have shown duPont, Atofina, Daikin, Ashi Glass, Ciba, Mitsui,

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Clariant and the other current producers even more damning information. They obviously are not smart enough to understand or else they are immoral. Otherwise they too would have halted production. Jawboning or painting them into a corner is not working. They are obviously in the polluters' stall mode. They will not take any action that does not help them stall. In their mind any action on their part might bring lawsuits. You have to act.

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>Respectfully,

>Rich Purdy, PhD

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