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2006 JAN 24 PM 12: 59

8419-0106-16342

CONTAIN NO CBI

6 January 2006

VIA OVERNIGHT MAIL

TSCA Confidential Business Information Center (7407M)
EPA East - Room 6428
Attn: Section 8(e)
U.S. Environmental Protection Agency
1201 Constitution Avenue, NW
Washington, D.C. 20004-3302
Phone: 202-564-8940



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2006 JAN - 9 AM 9: 33

Dear Sir/Madam:

Re: Perfluorinated Organics Analysis Report

On December 16, 2005, the attached document was received by DuPont from Mr. Gary Matheny of Crystal Spring. The document purports to contain analytical results for Perfluorinated Organics from sources identified as "CSW" and "CSWZ", both of which are further identified in handwriting as "Crystal Spring." Through separate discussions with counsel for the Little Hocking Water Association ("Little Hocking"), DuPont understands that AXYS laboratory performed this analysis at the request of Little Hocking. DuPont only learned of the performance of and results from this analysis after completion. DuPont does not have sufficient basis to verify the information contained in the attached document, nor does it attest to the validity and accuracy of it.

The document is being provided to EPA as it was received by DuPont from Mr. Matheny. It consists of the following pages:

- page 1 - December 16, 2005 fax transmittal sheet from Little Hocking Water Association, Inc. to Crystal Spring
- page 2 - Form 1A Perfluorinated Organics Analysis Report from Axys Analytical Services for Sample 1
- page 3 - Table with "Sample 2" handwritten on it



- page 4 - Form 1A Perfluorinated Organics Analysis Report from Axys Analytical Services for Sample 1 (this page appears to contain the same information as page 2)
- page 5 - table listing Compound, Acronym, Common Name, and Molecular Formula

In addition, Mr. Matheny verbally informed DuPont that he had additional analyses conducted on Crystal Spring water and that these analyses showed results in the same range as those reflected in the attached document. DuPont has not been provided with these analytical results in written form or in a report. DuPont does not have sufficient basis to verify this information, nor can DuPont attest to the validity or accuracy of it.

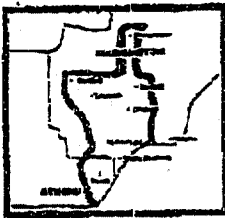
As DuPont has insufficient basis to fully evaluate or validate this information disclosed in this letter, DuPont makes no conclusion as to whether or not the information triggers reporting obligations under TSCA section 8(e). However, DuPont is forwarding this information to EPA in light of the Agency's continued interest in perfluorinated substances.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Andrea V. Malinowski', with a long, sweeping horizontal line extending to the right.

Andrea V. Malinowski

Attachment: 5 pages



LITTLE HOCKING WATER ASSOCIATION, INC.

P.O. Box 188 • St. Rt. 124 • Little Hocking, OH 45742
(740) 989-2181 Fax (740) 989-5543

FAX TRANSMITTAL SHEET

FAX PHONE NUMBER 740-373-0758

DATE: 16 DEC 2005

TO: CRYSTAL SPRING

ATTN: GARY MATHENY

RE: AXYS TEST RESULTS

Number of pages including cover sheet 4

If all pages are not received, please contact us as soon as possible.

COMMENTS:

GARY

HERE IS INFO YOU REQUESTED.
PLEASE CALL IF YOU HAVE ANY
QUESTIONS.

ng/l = parts per trillion

Signed: Bob

SAMPLE 1

AXYS METHOD MLA-440 Rev 01

Form 1A

PERFLUORINATED ORGANICS ANALYSIS REPORT

CLIENT SAMPLE NO.
CSW CRYSTAL SPRING
Sample Collection:
31-Oct-2005 13:15

AXYS ANALYTICAL SERVICES

P.O. Box 2219, 2045 MILLS RD. WEST, SIDNEY, B.C., CANADA
V6L 3S8 TEL (250) 855-5800 FAX (250) 855-5811

Contract No.:

4319

Lab Sample I.D.:

L8359-3

Matrix:

AQUEOUS

Sample Size:

0.500 L

Sample Receipt Date:

01-Nov-2005

Initial Calibration Date:

09-Nov-2005

Extraction Date:

08-Nov-2005

Instrument ID:

LC MS/MS

Analysis Date:

09-Nov-2005 Time: 21:04:43

Column ID:

C18

Extract Volume (uL):

4000

Sample Data Filename:

FC5G_232 5:15

Injection Volume (uL):

15

Blank Data Filename:

FC5G_232 5:15

Dilution Factor:

N/A

Cal. Ver. Data Filename:

FC5G_232 5:15

Concentration Units:

ng/L

COMPOUND	LAB FLAG ¹	CONC. FOUND	DETECTION LIMIT	RETENTION TIME
PFBA	U		1.10	
PFPeA	U		1.04	
PFHxA	U		1.01	
PFHpA		1.48	1.02	4:14
PFOA		15.3	1.08	4:42
PFNA	U		1.04	
PFDA	U		1.04	
PFUnA	U		1.05	
PFDoA	U		1.08	
PFBS	U		1.98	
PFHxS	U		2.03	
PFOS	U		1.98	
PFOSA	U		0.999	

(1) Where applicable, custom lab flags have been used on this report; U = not detected.

Approved by:

[Signature]

QA/QC Chemist

For Axis Internal Use Only (XSL Template: FC-Form1A.xsl; Created: 14-Nov-2005 12:57:45; Application: XSL Transform-1.1.0;
Report Filename: PFC_FC_LC_PFOA_L8359-3_Form1A_S1426795.html; Workgroup: W017481; Design ID: 314)

These pages are part of a larger report that may contain information necessary for full data evaluation.

250-655-5800

SAMPLE 2

CRYSTAL
SPRING

CLIENT ID	3TB - Travel Blank3	2TB - Travel Blank2	CSWZ	Lab Blank	Spiked Matrix	CSWZ (Duplicate)
AXYS ID	L8446-1	L8446-2	L8446-5 (A)	WG17699-101	WG17699-102	WG17699-103 (DUP L8446-5)
WORKGROUP	WG17699	WG17699	WG17699	WG17699	WG17699	WG17699
Sample Size	0.500 L	0.501 L	0.499 L	0.500 L		0.251 L
UNITS	ng/L	ng/L	ng/L	ng/L	% Recov	ng/L
PFBA	<1.09	<1.09	<1.10	<1.10	84	<2.18
PFPeA	<1.03	<1.03	<1.04	<1.04	96	<2.06
PFHxA	<1.01	<1.01	<1.02	<1.01	98.9	<2.01
PFHpA	<1.01	<1.01	<1.02	<1.02	80	<2.02
PFOA	<1.08	<1.07	17.5	<1.08	92	14.7
PFNA	<1.04	<1.04	<1.05	<1.04	89.6	<2.08
PFDA	<1.03	<1.03	<1.04	<1.04	97	<2.08
PFUnA	<1.05	<1.04	<1.05	<1.05	102	<2.08
PFOqA	<1.06	<1.05	<1.06	<1.06	85.6	<2.11
PFBS	<1.99	<1.98	<2.00	<1.89	86.9	<3.96
PFHxS	<2.03	<2.03	<2.04	<2.04	84.5	<4.05
PFOS	<1.98	<1.97	<1.99	<1.98	77.4	<3.95
PFOSA	<0.999	<0.995	<1.00	<1.00	71.5	<1.99

SAMPLE 2

CRYSTAL
SPRING

CLIENT ID	3TB - Travel Blank3	2TB - Travel Blank2	CSWZ	Lab Blank	Spiked Matrix	CSWZ (Duplicate)
AXYS ID	L8446-1	L8446-2	L8446-5 (A)	WG17699-101	WG17699-102	WG17699-103 (DUP L8446-5)
WORKGROUP	WG17699	WG17699	WG17699	WG17699	WG17699	WG17699
Sample Size	0.500 L	0.501 L	0.499 L	0.500 L		0.251 L
UNITS	ng/L	ng/L	ng/L	ng/L	% Recov	ng/L
PFBA	<1.09	<1.08	<1.10	<1.10	84	<2.18
PFPeA	<1.03	<1.03	<1.04	<1.04	86	<2.06
PFHxA	<1.01	<1.01	<1.02	<1.01	88.9	<2.01
PFHpA	<1.01	<1.01	<1.02	<1.02	80	<2.02
PFQA	<1.08	<1.07	17.5	<1.08	92	14.7
PFNA	<1.04	<1.04	<1.05	<1.04	89.6	<2.08
PFDA	<1.03	<1.03	<1.04	<1.04	97	<2.08
PFUnA	<1.05	<1.04	<1.05	<1.05	102	<2.08
PFDoA	<1.06	<1.06	<1.06	<1.06	85.6	<2.11
PFBS	<1.99	<1.98	<2.00	<1.99	86.9	<3.96
PFHxS	<2.03	<2.03	<2.04	<2.04	84.5	<4.06
PFOS	<1.98	<1.97	<1.99	<1.98	77.4	<3.95
PFOSA	<0.999	<0.995	<1.00	<1.00	71.5	<1.99

SAMPLE 1

AXYS METHOD MLA-040 Rev 01

Form 1A

PERFLUORINATED ORGANICS ANALYSIS REPORT

CLIENT SAMPLE NO.
CSW CAPITAL SPRINK WATER
Sample Collection:
31-Oct-2005 15:15

AXYS ANALYTICAL SERVICES

P.O. Box 2219, 2045 MILLS RD. WEST, SIDNEY, B.C., CANADA
VEL 330 TEL (250) 855-5500 FAX (250) 855-5511
Contract No.: 4319

Matrix: AQUEOUS

Lab Sample ID.: L8359-3

Sample Receipt Date: 01-Nov-2005

Sample Size: 0.503 L

Extraction Date: 08-Nov-2005

Initial Calibration Date: 09-Nov-2005

Analysis Date: 09-Nov-2005 Time: 21:34:43

Instrument ID: LC MS/MS

Extract Volume (uL): 4000

Column ID: C18

Injection Volume (uL): 15

Sample Data Filename: FC5G_232 S:15

Dilution Factor: N/A

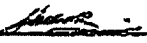
Blank Data Filename: FC5G_232 S:15

Concentration Units: ng/L

Cal. Ver. Data Filename: FC5G_232 S:16

COMPOUND	LAB FLAG ¹	CONC. FOUND	DETECTION LIMIT	RETENTION TIME
PFBA	U		1.10	
PFPeA	U		1.04	
PFHxA	U		1.01	
PFHpA		1.45	1.02	4:14
PFOA		15.3	1.08	4:42
PFNA	U		1.04	
PFDA	U		1.04	
PFUnA	U		1.05	
PFDoA	U		1.05	
PFBS	U		1.99	
PFHxS	U		2.03	
PFOS	U		1.98	
PFOSA	U		0.995	

(1) Where applicable, custom lab flags have been used on this report: U = not detected.

Approved by:  QA/QC ChemistFor Axis Internal Use Only | XSL Template: FC-Form1A.xsl; Created: 14-Nov-2005 12:57:45; Application: XSL Transformer 1.3.0;
Report Filename: PFC_FC_LC_PFOA_L8359-3_Form1A_SJ486795.html; Workgroup: W217481; Design ID: 314

These pages are part of a larger report that may contain information necessary for full data evaluation.



Compound	Acronym	Common Name	Molecular Formula
Perfluorobutylsulfonate anion	PFBS	C4	$C_4F_9SO_3^-$
Perfluorohexanesulfonate anion	PFHxS	C6	$C_6F_{13}SO_3^-$
Perfluorooctanesulfonate anion	PFOS	C8	$C_8F_{17}SO_3^-$
Perfluoropentanoic acid anion	PFPeA	C5	$C_5F_9COO^-$
Perfluorohexanoic acid anion	PFHxA	C6	$C_6F_{11}COO^-$
Perfluoroheptanoic acid anion	PFHpA	C7	$C_7F_{13}COO^-$
Perfluorooctanoic acid anion	PFOA	C8	$C_8F_{15}COO^-$
Perfluorononanoic acid anion	PFNA	C9	$C_9F_{17}COO^-$
Perfluorodecanoic acid anion	PFDA	C10	$C_{10}F_{19}COO^-$
Perfluoroundecanoic acid anion	PFUnA	C11	$C_{11}F_{21}COO^-$
Perfluorododecanoic acid anion	PFDoA	C12	$C_{12}F_{23}COO^-$
Perfluorotetradecanoic acid anion	PFTA	C14	$C_{14}F_{27}COO^-$