

AR226 - 2743

8EHQ-1204-158568



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December 7, 2004

Charles M. Auer
Office of Pollution Prevention and Toxics (OPPT)
U.S. Environmental Protection Agency
EPA East
1201 Constitution Avenue, NW
Washington, D.C. 20460



**Re: Further DuPont Voluntary Response to EPA's November 4, 2004 Request
Submission to AR-226 and TSCA 8(e) Office
Toxicology, Pharmacokinetics, Fate and Transport, Product Contamination**

Dear Charlie:

The attached document production and information submitted with this letter represents DuPont's good faith effort to respond to EPA's November 4, 2004 request for voluntary submission of certain material.

Modified Timeline for Submissions

Pursuant to discussions between EPA and counsel for DuPont, the timeline for submission of information that your office initially requested be submitted by December 6, 2004 has been modified. It is our understanding that your office now would like receive the requested information according to the following timeline:

- On or by December 7, 2004 – submission of all Haskell reports on toxicology and pharmacokinetics, as well as information on fate and transport and product contamination
- On or by December 10, 2004 – submission of occupational blood monitoring summary documents and/or reports (underlying data to be submitted at a later date, to be determined)
- On or by December 24, 2004 – submission of occupational monitoring reports other than blood monitoring (i.e., industrial hygiene and epidemiology)



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- On or by January 7, 2005 – submission of any other environmental monitoring reports and information

If our understanding of this modified timeline is incorrect, please contact me as soon as possible.

Submission for December 7, 2004

The documents submitted with this letter pertain to the submission requested by December 7, 2004. A summary of the steps taken to collect the information requested by EPA for this submission, along with the guidelines used to assess responsiveness to the EPA request, is provided on the Attachment 1 to this letter.

A summary of the contents of this submission is provided in Attachment 2 to this letter. There is a public version of the submission and a CBI version of the submission. In addition to a cumulative index for this submission, each individual binder also contains a complete index specific to the subject matter of the binder (e.g., the binder for volume 31, part 1 on "Telomers – toxicity/pharmacokinetics reports" contains the entire index for submitted reports on that subject matter).

TSCA 8(e) Office Submission

DuPont does not believe that the information submitted with this letter triggers reporting obligations under TSCA section 8(e). However, in the course of discussions with OPPT and the Office of Regulatory Enforcement (ORE), it has become clear to DuPont that those two offices are applying standards of reporting under TSCA section 8(e) that DuPont cannot anticipate. Accordingly, DuPont initially informed EPA that DuPont intended to submit this production to both the AR-226 docket and the TSCA 8(e) office, as was done with the submission of November 15, 2004. EPA has, however, informed counsel for DuPont that it is not necessary to make a duplicate, formal submission to the 8(e) office in order to discharge any reporting obligations that EPA might otherwise assert. Instead, EPA has asked that DuPont make only a single submission and advised that DuPont should indicate in this cover letter that the submission is intended for both the AR-226 docket and the TSCA 8(e) office.

As such, DuPont states that the enclosed documents are intended to be a submission to both the AR-226 docket and, as a precaution, to the TSCA 8(e) office, notwithstanding DuPont's firm belief that the information does not trigger reporting obligations under that section of TSCA. This submission should not be construed as a direct or indirect admission that DuPont believes that any of the enclosed information triggers such reporting obligations. We understand that



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ORE has agreed that DuPont's submission shall not prevent Dupont from asserting, in any proceeding, that section 8(e) did not require submission of this information.

Continued Activity

After EPA has had the opportunity to review this letter and the documents, we are available at your convenience to discuss the documents in further detail to assist in your understanding. In the meantime, we will continue to gather materials for the remaining submissions, review and produce any additional documents that are located and are relevant to the topics that are the subject of this submission, and create the electronic files you requested.

Please contact me directly if you have any questions or need further clarification with respect to this submission.

Sincerely,

A handwritten signature in black ink, appearing to read 'Peter'.

Peter D. Robertson

Attachments

- Attachment 1
- Attachment 2 – Summary of submission
- Public submission – number of boxes: 16
- CBI submission – number of boxes: 16

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ATTACHMENT 1

The sections below provide a summary of the steps taken to collect and produce the information requested in the particular category indicated. For each category, please note that DuPont does not maintain a comprehensive file of all such information for the entire Company. The documents were collected either from the over one million pages of documents collected for a class action lawsuit in West Virginia or from files of individuals most likely to have documents responsive to EPA's request. Note that the documents collected for purposes of the West Virginia litigation are primarily related to PFOA.

For purposes of this document production, and in the interest of attempting to make this production useful and purposeful to the Agency and to avoid redundancy, DuPont followed the guidelines provided below. Please note, however, that if the Agency wants DuPont to submit the type of information that is indicated below as not being submitted herewith, please notify us and we will provide the requested information.

General Guidelines for December 6 Submission

This submission does not include the following types of documents:

- Draft documents where it is known that a final version exists
- Documents known to be in the possession of EPA (either at headquarters or an EPA Regional Office) – note though that toxicology and pharmacokinetics reports could not, due to the submission deadline, be cross-checked to determine if they have already been submitted to EPA (see specific section below on the toxicology submission)
- Documents concerning emission reduction efforts, treatment, recycle, and process information/improvements
- Non-DuPont documents (includes documents from other companies, plaintiffs' counsel, etc.)
- Documents concerning telomers that were not commercialized (i.e., research materials) or that are not currently commercially available
- Publications
- Material Safety Data Sheets
- Customer information and presentations to customers
- Presentations and other documents that reference data that is in a report submitted to EPA

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- Documents that are subject to attorney-client privilege
- Documents concerning work-in-progress (Note though that DuPont will provide periodic updates to EPA on work-in-progress, per the November 10, 2004 presentation to EPA, and will submit reports on such work to EPA when final)

Summary of Collection Process for Specific Categories of Requested Information

TOXICITY AND PHARMACOKINETICS ON PFOS, PFOA, TELOMER ALCOHOLS, AND OTHER RELATED FLUOROCHEMICALS, INCLUDING TELOMER POLYMERS

Most of the toxicity and pharmacokinetic reports for DuPont are generated at the DuPont Haskell Laboratory. The files for Haskell Laboratory were searched for toxicity and pharmacokinetic reports on PFOS, PFOA, telomer alcohols, and telomer polymers. The telomer category search was focused, as stated above, on those telomers that are currently in commercial use.

In addition, DuPont outside counsel for the West Virginia class action litigation collected toxicology and pharmacokinetics documents produced for purposes of the litigation and provided them for review by DuPont as a cross-check against the reports collected from Haskell Laboratory. The documents produced for litigation are focused, however, on PFOA and do not necessarily include telomers.

The reports submitted have not, due to the limited time provided for submission of these reports, been cross-checked to determine whether they have previously been submitted to the Agency. Please contact me if you want DuPont to conduct such a cross-check.

Finally, we are also providing some documents that we believe may be of interest and useful to the Agency that address toxicity or pharmacokinetics, but that are not in the form of a formal report.



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FATE AND TRANSPORT ON PFOS, PFOA, TELOMER ALCOHOLS, AND OTHER RELATED FLUOROCHEMICALS, INCLUDING TELOMER POLYMERS

Information on fate and transport was collected primarily from individuals most likely to possess such documents.

PRODUCT CONTAMINATION

Information on product contamination was collected from individuals most likely to possess such documents.



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ATTACHMENT 2

Summary of December 7, 2004 Submission

Public Version

<u>Box no.</u>	<u>Volume</u>	<u>Part no.</u>	<u>Topic</u>
1	-	-	Cumulative index
	30	1-3	PFOA – tox/pharmaco
2	31	1-3	Telomers – tox/pharmaco
3	31	4-6	Telomers – tox/pharmaco
4	31	7-9	Telomers – tox/pharmaco
5	31	10-12	Telomers – tox/pharmaco
6	31	13-15	Telomers – tox/pharmaco
7	31	16-18	Telomers – tox/pharmaco
8	31	19-21	Telomers – tox/pharmaco
9	31	22-24	Telomers – tox/pharmaco
10	31	25-27	Telomers – tox/pharmaco
11	31	28-30	Telomers – tox/pharmaco
12	31	31-33	Telomers – tox/pharmaco
13	31	34-36	Telomers – tox/pharmaco
14	31	37-39	Telomers – tox/pharmaco
15	31	40-41	Telomers – tox/pharmaco
16	32	-	Product Contamination
16	33	-	Environmental Fate
16	34	-	Misc. Tox/pharmaco

Confidential Version

<u>Box no.</u>	<u>Volume</u>	<u>Part no.</u>	<u>Topic</u>
1	-	-	Cumulative index

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	30	1-3	PFOA – tox/pharmaco
2	31	1-3	Telomers – tox/pharmaco
3	31	4-6	Telomers – tox/pharmaco
4	31	7-9	Telomers – tox/pharmaco
5	31	10-12	Telomers – tox/pharmaco
6	31	13-15	Telomers – tox/pharmaco
7	31	16-18	Telomers – tox/pharmaco
8	31	19-21	Telomers – tox/pharmaco
9	31	22-24	Telomers – tox/pharmaco
10	31	25-27	Telomers – tox/pharmaco
11	31	28-30	Telomers – tox/pharmaco
12	31	31-33	Telomers – tox/pharmaco
13	31	34-36	Telomers – tox/pharmaco
14	31	37-39	Telomers – tox/pharmaco
15	31	40-41	Telomers – tox/pharmaco
16	32	-	Product Contamination
16	33	-	Environmental Fate
16	34	-	Misc. Tox/pharmaco

DOCUMENT	DATE	VOLUME	TAB
HLR 55-61	11/08/61	30	001
HLR 123-65	08/19/65	30	002
HLR 128-68	06/13/68	30	003
HLR 129-68	06/13/68	30	004
HLR 133-68	06/14/68	30	005
HLR 160-69	06/17/69	30	006
HLR 253-79	07/20/79	30	007
HLR 635-79	10/05/79	30	008
HLR 636-79	10/05/79	30	009
HLR 659-79	02/26/80	30	010
HLR 664-80	09/15/80	30	011
HLR 682-80	09/22/80	30	012
HLR 783-80	10/01/80	30	013
HLR 1005-80	12/09/80	30	014
HLR 1006-80	12/09/80	30	015
HLR 1007-80	12/22/80	30	016
HLR 1072-80	01/09/81	30	017
HLR 673-96	01/15/81	30	018
HLR 205-81	04/15/81	30	019
HLR 291-81	06/01/81	30	020
HLR 295-81	06/01/81	30	021
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HLR 600-81	10/07/81	30	025
HLR 612-81	10/23/81	30	026
HLR 560-81	10/26/81	30	027
HLR 593-81	12/07/81	30	028
HLR 828-81	12/31/81	30	029
HLR 93-82	12/31/81	30	030
HLR 793-81	01/12/82	30	031
HLR 1-82	01/14/82	30	032
HLR 881-81	01/14/82	30	033
HLR 589-80	01/15/82	30	034
HLR 736-81	01/28/82	30	035
HLR 12-82	03/08/82	30	036
HLR 61-82	05/18/82	30	037
HLR 323-82	05/25/82	30	038
HLR 405-82	09/17/82	30	039
HLR 537-82	10/01/82	30	040
HLR 62-82	11/12/82	30	041
HLR 788-82	02/01/83	30	042
HLR 138-83	05/18/83	30	043
HLR 234-84	06/27/84	30	044
HLR 441-84	10/02/84	30	045
HLR 79-84	10/08/84	30	046
HLR 293-85	06/03/85	30	047
HLR 276-85	07/09/85	30	048
HLR 273-85	07/16/85	30	049
HLR 401-85	08/07/85	30	050
HLR 293-85 Rev 1	12/31/85	30	051

DOCUMENT	DATE	VOLUME	TAB
HLR 586-85	02/11/86	30	052
HLR 799-85	02/12/86	30	053
HLR 150-88	04/11/88	30	054
HLR 61-94	08/26/94	30	055
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DuPont-3381	12/20/99	30	058
DuPont-5206	06/13/01	30	059
DuPont-5207	08/09/01	30	060
DuPont-7977	12/17/01	30	061
Memo	06/19/02	30	062
DuPont-12020	01/17/03	30	063
DuPont-12737	04/03/03	30	064
DuPont-11561	04/07/03	30	065
DuPont-12988	05/14/03	30	066
DuPont-12989	05/20/03	30	067
DuPont-13788	10/16/03	30	068
DuPont-12944	11/05/03	30	069
DuPont-13267	12/15/03	30	070
DuPont-14096	01/14/04	30	071
23685 EAA	01/16/04	30	072
DuPont-15261	06/25/04	30	073
DuPont-15372	10/13/04	30	074
J-06362	undated	30	075
HLR 92-62	12/13/62	31	001
HLR 11-64	02/03/64	31	002
HLR 43-64	05/06/64	31	003
HLR 131-64	11/03/64	31	004
HLR 142-65	09/23/65	31	005
HLO 0190-65	11/30/65	31	006
HLO 0191-65	11/30/65	31	007
HLR 129-66	08/15/66	31	008
HLR 129-66	08/15/66	31	008
HLR 323-70	07/31/70	31	009
HLR 93-71	04/06/71	31	010
HLR 244-71	07/20/71	31	011
HLR 245-71	07/20/71	31	012
HLR 246-71	07/20/71	31	013
HL 68-73	02/23/73	31	014
HLO 191-73	04/12/73	31	015
HLR 162-73	04/13/73	31	016
HLR 234-73	05/08/73	31	017
HLR 275-73	05/23/73	31	018
HLR 276-73	05/23/73	31	019
HLO 333-73	06/01/73	31	020
HLO 334-73	06/01/73	31	021
HLO 336-73	06/01/73	31	022
HLR 372-73	08/21/73	31	023
HLO 157-74	02/12/74	31	024
HLO 160-74	02/12/74	31	025
HLO 161-74	02/12/74	31	026

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HLR 591-75	10/02/75	31	027
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HLR 723-75	12/09/75	31	029
HLR 66-76	01/30/76	31	030
HLR 115-76	02/17/76	31	031
HLR 802-76	10/29/76	31	032
HLR 803-76	10/29/76	31	033
HLR 825-76	11/05/76	31	034
HLR 960-76	12/17/76	31	035
HLR 1003-76	01/14/77	31	036
HLR 283-77	04/19/77	31	037
705221	05/04/77	31	038
HLR 430-77	06/10/77	31	039
HLR 448-77	06/17/77	31	040
HLR 622-77	08/19/77	31	041
HLR 643-77	08/19/77	31	042
HLR 672-77	08/26/77	31	043
HLR 737-77	09/23/77	31	044
HLR 775-77	10/07/77	31	045
HLR 912-77	11/04/77	31	046
HLR 961-77	11/23/77	31	047
HLR 984-77	12/09/77	31	048
HLR 56-78	02/10/78	31	049
HLR 58-78	02/10/78	31	050
HLR 43-78	02/17/78	31	051
HLR 144-78	03/31/78	31	052
HLR 422-78	08/04/78	31	053
HLR 521-78	09/22/78	31	054
HLR 718-78	12/01/78	31	055
HLR 744-78	12/15/78	31	056
HLR 721-78	12/22/78	31	057
HLR 52-79	03/16/79	31	058
HLR 376-79	06/02/79	31	059
HLR 397-79	07/20/79	31	060
HLR 325-79	08/03/79	31	061
HLR 324-79	08/24/79	31	062
HLR 58-80	01/28/80	31	063
HLR 56-80	02/05/80	31	064
HLR 55-80	02/07/80	31	065
HLR 494-80	04/29/80	31	066
HLR 561-80	07/23/80	31	067
HLR 562-80	07/23/80	31	068
HLR 571-80	07/30/80	31	069
HLR 572-80	07/30/80	31	070
HLR 617-80	08/13/80	31	071
HLR 866-80	11/10/80	31	072
HLR 70-81	02/14/81	31	073
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HLR 58-81	02/25/81	31	077

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HL 485-81	10/06/81	31	086
HLR 571-81	10/07/81	31	087
HLR 326-82	06/03/82	31	088
HLO 501-82	07/26/82	31	089
HLR 707-82	11/17/82	31	090
HLR 704-82	11/22/82	31	091
HLR 743-82	12/21/82	31	092
HLR 109-83	03/29/83	31	093
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HLR 29-84	01/13/84	31	095
510 TAL	05/30/84	31	096
HLR 143-84	06/27/84	31	097
509 TAR	06/28/84	31	098
511 TAL	06/28/84	31	099
HLR 114-84	07/25/84	31	100
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HLO 388-84	08/30/84	31	102
HLR 584-84	01/16/85	31	103
HLO 97-85	02/22/85	31	104
HLR 110-85	04/01/85	31	105
No report number	04/01/85	31	106
HLR 423-83 Rev 1	04/02/85	31	107
HLR 180-85	04/18/85	31	108
HLR 182-85	05/08/85	31	109
HLR 279-85	05/23/85	31	110
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HLR 415-85	09/17/85	31	112
HLR 802-85	01/06/86	31	113
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HLR 624-87	11/10/87	31	116
HLR 801-88	12/14/88	31	117
HLR 805-88	12/15/88	31	118
HLR 784-88	12/28/88	31	119
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HLR 360-89	06/29/89	31	121
HLR 391-89	07/21/89	31	122
HLR 385-89	07/31/89	31	123
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HLR 651-89	11/22/89	31	125
HLR 444-89	12/05/89	31	126
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HLR 180-90	05/02/90	31	130
HLO 379-90	07/11/90	31	131
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HLR 301-90	07/17/90	31	133
HLR 101-91	03/01/91	31	134
HLR 121-91	03/14/91	31	135
HLO 19-91	03/25/91	31	136
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HLR 214-91	04/26/91	31	138
HLR 320-91	05/20/91	31	139
HLR 333-91	05/20/91	31	140
HLR 325-91	06/03/91	31	141
HLR 457-91	06/26/91	31	142
HLR 448-91	07/02/91	31	143
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HLO 433-91	08/14/91	31	145
HLR 395-91	09/04/91	31	146
HLR 636-91	09/24/91	31	147
HLO 706-91	10/11/91	31	148
4070/91	10/22/91	31	149
HLR 632-91	02/11/92	31	150
HLR 802-91	02/13/92	31	151
HLR 809-91	02/13/92	31	152
HLR 813-91	02/24/92	31	153
No report number	06/04/92	31	154
HLR 423-92	06/09/92	31	155
HLR 422-92	06/16/92	31	156
HLR 460-92	07/01/92	31	157
HLR 437-92	07/10/92	31	158
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HLR 592-92	11/06/92	31	162
HLR 879-92	12/16/92	31	163
HLR 28-93	02/02/93	31	164
J-11847	02/17/93	31	165
J-11848	02/17/93	31	166
J-12128	02/17/93	31	167
J-12129	02/17/93	31	168
HLR 13-93	03/03/93	31	169
HLR 885-92	03/10/93	31	170
HLR 309-93	05/04/93	31	171
HLR 593-92	05/25/93	31	172
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920086 E	06/17/93	31	176
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HLR 752-93	12/21/93	31	180
43833	01/18/94	31	181
HLO 792-93	02/25/94	31	182
HLR 4-94	02/25/94	31	183
HLR 51-94	03/15/94	31	184
HLR 90-94	03/15/94	31	185
HLR 287-94	05/06/94	31	186
HLR 591-92	07/06/94	31	187
HLR 439-94	09/08/94	31	188
HLR 696-92	12/21/94	31	189
95/SAE6/0304/HT	01/09/95	31	190
53957	01/25/95	31	191
59798	03/06/95	31	192
258250	03/15/95	31	193
12373 MMO	03/24/95	31	195
12407 TSG	03/24/95	31	194
HLR 289-95	04/18/95	31	196
HLR 290-95	04/19/95	31	197
HLR 271-95	04/20/95	31	198
HLR 311-95	04/26/95	31	199
HLR 325-95	04/28/95	31	200
HLR 357-95	05/17/95	31	201
HLR 358-95	05/17/95	31	202
95/SAEK/0489/AMP	07/04/95	31	203
95/SAE6/0548/HT	07/10/95	31	204
HLO 447-95	08/24/95	31	205
HLR 602-95	08/28/95	31	206
J-11725	09/06/95	31	207
HLR 653-95	09/14/95	31	208
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J-11932	10/06/95	31	211
J-12126	10/06/95	31	212
HLR 708-95	10/09/95	31	213
95/SAE6/1205/HT	11/10/95	31	214
95/SAEK/1372/AMP	12/14/95	31	215
HLR 821-95	01/10/96	31	216
HLR 822-95	01/10/96	31	217
HLR 649-95	01/23/96	31	218
HLR 82-96	02/26/96	31	219
HLR 83-96	02/26/96	31	220
HLR 176-96	02/29/96	31	221
96/SAE6/0409/HT	03/12/96	31	222
HLR 179-96	03/28/96	31	223
HLR 605-96	08/26/96	31	224
HLR 606-96	08/28/96	31	225
HLR 782-96	08/30/96	31	226
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HL-1997-00260	03/31/97	31	252
HL-1997-00261	03/31/97	31	253
HLO 1997-00035	04/10/97	31	254
HL-1997-00273	06/17/97	31	255
HL-1997-00599	07/11/97	31	256
HL-1997-00600	07/11/97	31	257
HL-1997-00716	08/08/97	31	258
HL-1997-00735	08/08/97	31	259
HL-1997-00676	08/26/97	31	260
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Presentation	03/01/01	34	020
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