

8EHQ-0904-15666\$
AR226-1873

September 17, 2004

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**COMPANY SANITIZED -- DOES
NOT CONTAIN CONFIDENTIAL
BUSINESS INFORMATION**

By Certified Mail



Document Processing Center [7407M]
Attention TSCA 8(e) Coordinator
Office of Pollution Prevention and Toxics
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

COMPANY SANITIZED

Re: Information Submission Under TSCA Section 8(e)

Dear Sir or Madam:

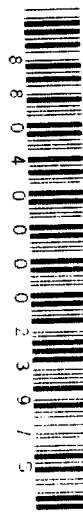
Pursuant to Section 8(e) of the Toxic Substances Control Act ("TSCA"), [CBI Deleted] is submitting information pertaining to the following three substances:

1. perfluorooctanoic acid ("PFOA"), CAS No. 335-67-1
2. perfluorononanoic acid ("PFNA"), CAS No. 375-95-1; and
3. perfluorodecanoic acid ("PFDA"), CAS No. 335-76-2.

The information we are providing, which is attached to this letter, consists of worker monitoring data that were recently obtained and tabulated by [CBI Deleted]. These data reflect measured levels of the subject chemicals in blood samples taken from workers at the [CBI Deleted] facility located at [CBI Deleted]. Blood levels were monitored in a total of 281 individuals working on three production lines: a production line for [CBI Deleted], in which [CBI Deleted] was used as a processing aid; a production line for [CBI Deleted], and a production line for [CBI Deleted]. In addition, a small number of workers in [CBI Deleted] research and development and quality assurance divisions were also included among the 281 individuals sampled.

[CBI Deleted] believes that the attached information does not rise to the level of "substantial risk" information that must be submitted under TSCA Section 8(e), for the following reasons:

- First, [CBI Deleted] believes that the worker monitoring data on PFOA that were obtained by [CBI Deleted] are merely corroborative of information that is already well known to EPA. We are aware that extensive information has previously been submitted to the Agency under TSCA Section 8(e) and other provisions of TSCA pertaining to blood levels of PFOA in workers at U.S. facilities that produce and/or utilize [CBI Deleted].



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- Second, [CBI Deleted] believes that worker monitoring data gathered from the [CBI Deleted] are irrelevant to assessing potential exposures and risks in the United States, because [CBI Deleted] employs a unique process for using [CBI Deleted], that is not utilized in any facility in the United States. To the extent that differences in blood levels are observed between workers in the United States and workers at [CBI Deleted], those differences are likely attributable to the unique manufacturing process employed by [CBI Deleted].
- Third, to the best of our knowledge, there are no facilities in the United States that manufacture [CBI Deleted]. Consequently, blood monitoring data from the [CBI Deleted] are irrelevant to assessing risks and/or exposures to workers in the United States.

Thus, the worker monitoring data obtained by [CBI Deleted] are either (i) corroborative of information that is already well known to EPA and has previously been submitted to the Agency under TSCA Section 8(e) and other provisions or (ii) irrelevant to assessing risks in the United States. As a consequence, the data do not constitute "substantial risk" information that must be reported under TSCA Section 8(e). Nevertheless, [CBI Deleted] is submitting this information under Section 8(e) to bring these data to the Agency's attention, consistent with our company's commitment to product stewardship, and out of an abundance of caution.

If you have any questions regarding this submission, please contact me at [CBI Deleted]. Also, please note that this submission contains confidential business information ("CBI") that should be protected against public disclosure. A "sanitized" version of this submission, from which CBI has been deleted is also being submitted herewith.

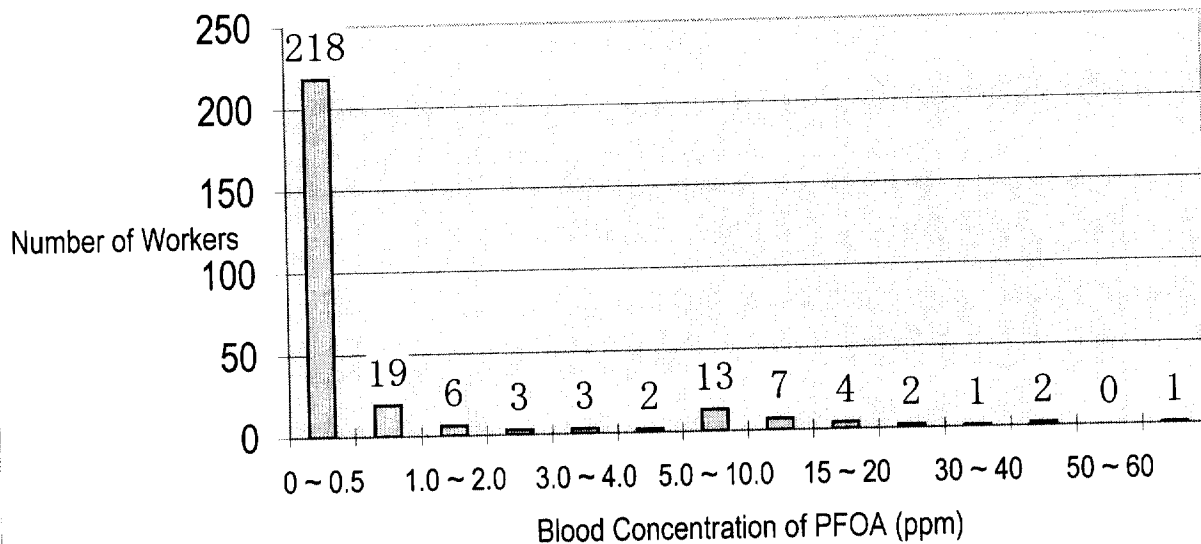
Sincerely,

[CBI Deleted]

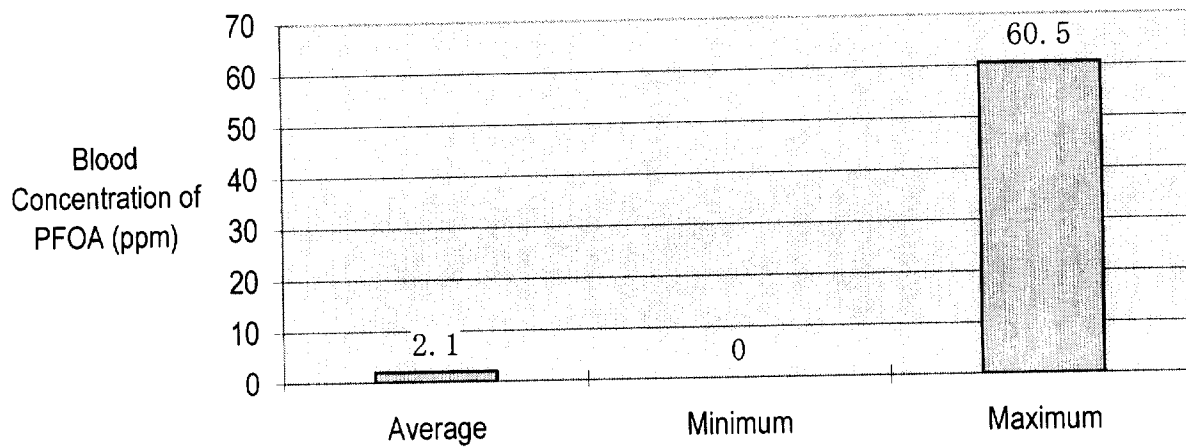
Attachment

Worker Monitoring Results for PFOA at the [CBI Deleted]

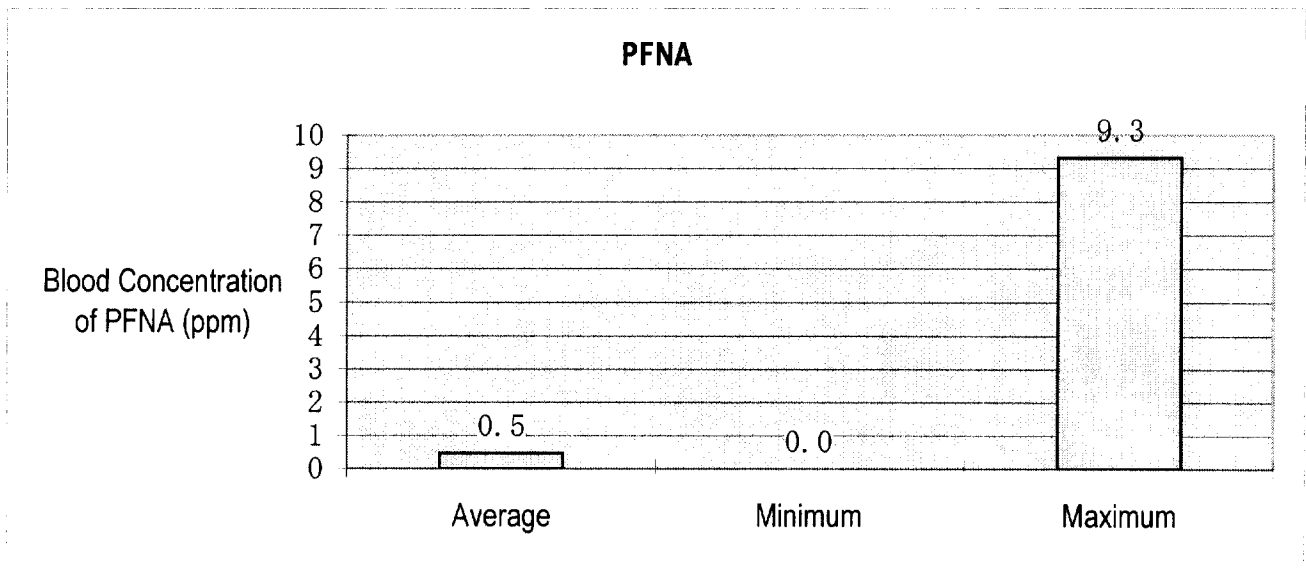
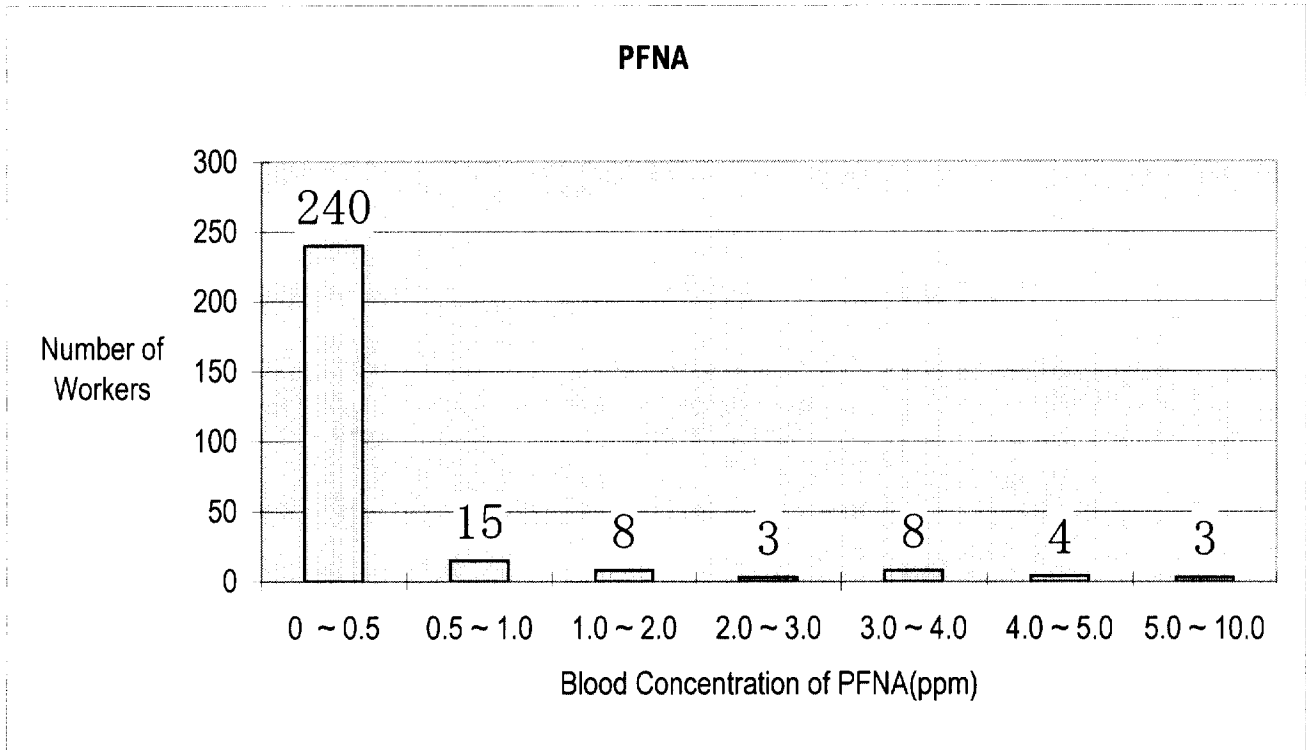
PFOA



PFOA



Worker Monitoring Results for PFNA at the [CBI Deleted]



Worker Monitoring Results for PFDA at the [CBI Deleted]

