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December 10, 2004

AR 226

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Mr. Charles M. Auer
Director
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
EPA East
1201 Constitution Avenue, NW
Washington, DC 20460



**Re: Further Dupont Voluntary Response to EPA's November 4, 2004 Request
Submission to AR 226 and TSCA 8(e) Office
Blood Monitoring Information**

Dear Charlie:

CONFIDENTIAL

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

Submission for December 10, 2004

The documents submitted with this letter pertain to the submission requested by December 10, 2004. Specifically, this submission pertains to occupational blood monitoring summary documents and/or reports. 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 an index for the contents of the binder.

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

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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 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,



Peter D. Robertson

Attachments

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

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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 10 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)
- Non-DuPont documents (includes documents from other companies, plaintiffs' counsel, etc.)
- Presentations and other documents that reference data that is in a report submitted to EPA
- 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)
- Supporting reports (e.g., lab analysis, etc.) for blood monitoring results

Summary of Collection Process for Specific Categories of Requested Information

The documents for this submission were collected from review of the documents produced in the class action litigation, along with collection of documents from individuals in the Company most likely to possess such information.



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In addition, to aid in understanding the information submitted, DuPont summarized the blood data from Washington Works, Fayetteville, and Chambers Works. These summaries are found in Volume 35 as follows:

Tab 28 Chambers Works (non-telomer)
Tab 77 Chambers Works (telomers)
Tab 34 Fayetteville
Tab 64 Washington Works

Finally, Volume 36 is a printout of the Fluoropolymers Laboratory Analysis Information Retrieval (FLAIR) database as from the Washington Works facility. Each page contains the work history and blood monitoring results for an individual employee (the name of the employee has been redacted from each page for privacy purposes). Note that the FLAIR database contains monitoring data through 2003; it does not yet contain the monitoring data collected for 2004. Year 2004 data for Washington Works is provided in Volume 35, Tab 64.

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ATTACHMENT 2

Summary of December 10, 2004 Submission

• **Public Version**

<u>Box no.</u>	<u>Volume</u>	<u>Part no.</u>	<u>Topic</u>
1	-	-	Cumulative index
1	35	-	Blood Monitoring
1	36	-	Fluoropolymers Laboratory Analysis Information Retrieval (FLAIR) database

• **Confidential Version**

<u>Box no.</u>	<u>Volume</u>	<u>Part no.</u>	<u>Topic</u>
1	-	-	Cumulative index
1	35	-	Blood Monitoring
1	36	-	Fluoropolymers Laboratory Analysis Information Retrieval (FLAIR) database [note that this binder does not contain TSCA CBI, but employee names have been redacted for privacy purposes]

VOL	TAB	DATE	DESCRIPTION	CATEGORY
035	001	11/09/81	Blood - Determination of Perfluorooctanoic Acid, Gas Chromatographic Method ✓	Analytical Methods - PFOA in Blood
035	002	07/16/98	Analysis of C-8 in blood, status of interlab comparison ✓	Analytical Methods - PFOA in Blood
035	003	01/29/01	Trip Report Reviewing National Medical Services Method ✓	Analytical Methods - PFOA in Blood
035	004	11/09/01	National Medical Services (GC-ECD) PFOA Method Change Proposal ✓	Analytical Methods - PFOA in Blood
035	005	11/22/01	Draft European GC/MS Method ✓	Analytical Methods - PFOA in Blood
035	006	01/29/02	Trip Report Reviewing National Medical Services Method ✓	Analytical Methods - PFOA in Blood
035	007	06/04/02	Advion Site Manual for Sample Preparation and Submission ✓	Analytical Methods - PFOA in Blood
035	008	07/12/02	Advion Method Validation Report: Method Validation for the Quantitation of Ammonium Perfluorooctanoate Anion (PFOA, 0.05 to 10 micrograms/milliliter Concentration Range), in Human Serum by Turbo Ion Spray LC/MS/MS ✓	Analytical Methods - PFOA in Blood
035	009	01/31/03	Advion: Bioanalytical Method Validation for the Quantitation of Perfluorooctanoic Acid in Human Serum ✓	Analytical Methods - PFOA in Blood
035	010	09/30/03	Advion: Quantitative Determination of Ammonium Perfluorooctanoate (APFO), Measured as the Perfluorooctanoate Anion (PFOA), in Human Serum from Study DW04 Using Turbo Ion Spray LC/MS/MS ✓	Analytical Methods - PFOA in Blood
035	011	01/08/04	Exygen: Method of Analysis for the Determination of Perfluorooctanoic Acid (PFOA) in Serum by LC/MS/MS - Revision 2 ✓	Analytical Methods - PFOA in Blood
035	012	undated	Validation of Determination of Total Fluorine in Blood by Wickbold Torch With Direct Potentiometric Detection ✓	Analytical Methods - PFOA in Blood
035	013	07/23/79	Memo from B. C. McKusick to F.E. French, Jr., entitled: "Discussion of Fluorochemicals with 3M" ✓	General PFOA in Blood Data
035	014	07/25/79	Memo from J. W. Raines to R. L. Richards, entitled: "Organic Fluorocompounds in Blood" ✓	General PFOA in Blood Data
035	015	10/18/79	Table: C-8 (FC-143) - Ammonium Perfluorooctanoate Chronological Summary of Reports ✓	General PFOA in Blood Data
035	016	02/28/80	Table: F&F Department FC-143 Data February, 1980 ✓	General PFOA in Blood Data
035	017	03/03/80	Table: Summary Organic Fluorides in Blood Samples ✓	General PFOA in Blood Data
035	018	05/14/81	Table: C-8 Level Locations Other than Washington Works ✓	General PFOA in Blood Data
035	019	08/25/82	Correspondence from Timothy P. Pastoor to J. G. Loschiavo entitled "Ammonium Perfluorooctanoate (C-8) in Human Blood" ✓	General PFOA in Blood Data

VOL	TAB	DATE	DESCRIPTION	CATEGORY
035	020	undated	Additional Information for Supervision ✓	General PFOA in Blood Data
035	021	undated	Table: Employee Blood Data (1979, 1981, 1999) ✓	General PFOA in Blood Data
035	022	08/27/81	Table: Analytical Results: FC-143 in Blood Polymer Products – Chambers Works ✓	Chambers Works PFOA in Blood Data
035	023	09/23/99	Memo from Robin C. Leonard to Barbara Dawson entitled "C-8 Surveillance" ✓	Chambers Works PFOA in Blood Data
035	024	10/19/00	E-mail from Barbara J. Dawson to multiple people entitled "C8 Follow-up Medical Surveillance" ✓	Chambers Works PFOA in Blood Data
035	025	10/19/00	E-Mail from Barbara J. Dawson to multiple people entitled "C8 Medical Surveillance – Draft Letter to Participants" ✓	Chambers Works PFOA in Blood Data
035	026	01/19/01	E-Mail from Barbara J. Dawson to Robin C. Leonard entitled "NMS Results" ✓	Chambers Works PFOA in Blood Data
035	027	undated	Proposal for Feasibility Assessment entitled " Estimating Exposure, Biopersistence, and Potential Liver Effects from Workplace Exposures to Organofluorines: A determination of the feasibility of appropriate analyses of historical surveillance data", ✓	Chambers Works PFOA in Blood Data
035	028	11/20/04	Summaries of Chambers Works PFOA in Blood ✓	Chambers Works PFOA in Blood Data
035	029	10/20/81	Table: DuPont de Nemours (Nederland) B.V. Dordrecht Works ✓	Dordrecht Works PFOA in Blood Data
035	030	02/00/97	Two pages extracted from C-8 PACE Team Meeting Notes with blood data from the Dordrecht Works ✓	Dordrecht Works PFOA in Blood Data
035	031	undated	C-8 in Bloed Monitoring Results in FLPR Dordrecht ✓	Dordrecht Works PFOA in Blood Data
035	032	11/01/82	Memo from S. R. Laas to J. D. De Laurentis, M.D. entitled "Analysis of Blood Samples for Perfluorooctanoate" ✓	Experimental Station PFOA in Blood Data
035	033	12/15/03	Exposure Assessment Protocol entitled "Exposure Assessment of Measured Serum Perfluorinated Octanoic Acid Anion in the Manufacture of Ammonium Perfluorooctanoate (APFO) at Fayetteville, NC" ✓	Fayetteville Works PFOA in Blood Data
035	034	11/19/04	Summaries of Fayetteville Works PFOA in Blood Data ✓	Fayetteville Works PFOA in Blood Data
035	035	02/25/80	Memo from E. R. Purchase to G. L. Watts entitled "FC-143 Surfactant" ✓	Spruance PFOA in Blood Data
035	036	undated	Table: Table II GC Precision ✓	Spruance PFOA in Blood Data
035	037	10/10/79	Table: Organic Fluorides in Blood Samples ✓	Washington Works PFOA in Blood Data
035	038	10/16/79	Hand-written table entitled "Organic Fluorides in Blood Samples Complete Results" ✓	Washington Works PFOA in Blood Data

VOL	TAB	DATE	DESCRIPTION	CATEGORY
035	039	05/14/81	Table: C-8 Level – Current Washington Works Female Employees ✓	Washington Works PFOA in Blood Data
035	040	12/01/81	Table: C-8 Blood Levels in Females Transferred Out of Teflon ✓	Washington Works PFOA in Blood Data
035	041	02/12/82	Memo from J. F. Doughty to R. D. Ingalls entitled "Work Histories of Females" ✓	Washington Works PFOA in Blood Data
035	042	07/14/82	Memo from J. G. Loschiavo to R. J. Burger entitled "Trends in Blood C-8 Levels for Various Teflon® Employee Groups" ✓	Washington Works PFOA in Blood Data
035	043	07/29/82	Memo from J. G. Loschiavo to R. J. Zipfel entitled "Retention of Ammonium Perfluorooctanoate (C-8) in Blood of Teflon® Employees" ✓	Washington Works PFOA in Blood Data
035	044	09/28/82	Memo from J. G. Loschiavo to R. J. Zipfel entitled "Ammonium Perfluorooctanoate in Blood of Teflon® Employees" ✓	Washington Works PFOA in Blood Data
035	045	08/11/83	Memo from J. G. Loschiavo to T. M. Kemp entitled "Update on the C-8 Blood Sampling Program" ✓	Washington Works PFOA in Blood Data
035	046	10/10/83	Hand-written table with no title ✓	Washington Works PFOA in Blood Data
035	047	10/19/83	Tables with C-8 Blood Sample Results by Job ✓	Washington Works PFOA in Blood Data
035	048	10/27/83	Memo from J. G. Loschiavo to J. W. Raines entitled "Washington Works Blood C-8 Levels for Non-Fluoropolymers Division Employees" ✓	Washington Works PFOA in Blood Data
035	049	06/11/84	Table entitled "Table 1: Teflon® Fine Powder/Dispersion Operators C-8 Blood Sample Results" hand-dated 6/11/84 ✓	Washington Works PFOA in Blood Data
035	050	06/14/84	Memo from J. G. Loschiavo to T. M. Kemp entitled "Update on the C-8 Blood Sampling Program" ✓	Washington Works PFOA in Blood Data
035	051	06/09/87	Table entitled "C-8 Trend in Blood" ✓	Washington Works PFOA in Blood Data
035	052	06/10/87	Table entitled "WW C-8 Blood Analyses (Non-Fluorocarbon Exposure)" ✓	Washington Works PFOA in Blood Data
035	053	08/06/87	Hand-drawn graphs Blood C-8 Level Change vs. Time ✓	Washington Works PFOA in Blood Data
035	054	06/14/89	Memo from R. D. Lanyon to H. A. Smith et al entitled "C-8 Blood Data" ✓	Washington Works PFOA in Blood Data
035	055	03/19/90	Memo from H. A. Smith to J. G. Loschiavo et al entitled "Review of Washington Works C-8 Data Personnel Air Monitoring and Blood Data" ✓	Washington Works PFOA in Blood Data
035	056	04/00/90	Report entitled "Review of Washington Works C-8 Data Personnel Air Monitoring and Blood" ✓	Washington Works PFOA in Blood Data
035	057	01/02/92	Tables ✓	Washington Works PFOA in Blood Data

VOL	TAB	DATE	DESCRIPTION	CATEGORY
035	058	00/00/94	Table entitled "1994 C-8 in Blood Results" ✓	Washington Works PFOA in Blood Data
035	059	06/17/97	E-mail from Anthony J. Playtis to Younger L. Power entitled "1997 Voluntary C-8 Blood Testing" ✓	Washington Works PFOA in Blood Data
035	060	11/03/97	Report by A. J. Playtis entitled "Results of the 1995 Study of C-8 Blood Levels" ✓	Washington Works PFOA in Blood Data
035	061	08/02/00	E-mail from Anthony J. Playtis to Robbin Banerjee et al entitled "Preliminary C-8 Blood Results for Washington Works" ✓	Washington Works PFOA in Blood Data
035	062	08/08/00	Memo from Anthony J. Playtis to Gary W. Jepson entitled "Pensioner Blood Data" ✓	Washington Works PFOA in Blood Data
035	063	11/17/00	Presentation entitled "Washington Works Blood Data Summary" by R. F. Pinchot ✓	Washington Works PFOA in Blood Data
035	064	11/20/04	Summaries of blood data by year and spreadsheets containing raw data ✓	Washington Works PFOA in Blood Data
035	065	undated	Table entitled "WW APFO in Blood, 1985 and 1984" ✓	Washington Works PFOA in Blood Data
035	066	undated	Title entitled "Half Life Results from Pensioners" ✓	Washington Works PFOA in Blood Data
035	067	undated	Table entitled "WW APFO in Blood, 1989-90" ✓	Washington Works PFOA in Blood Data
035	068	undated	Table entitled "Average for Job" ✓	Washington Works PFOA in Blood Data
035	069	undated	Series of tables, 10 pages ✓	Washington Works PFOA in Blood Data
035	070	03/24/87	Kinetics of Sorption and Elimination of Fluorinated Surfactants in Blood ✓	Telomers Blood Data General
035	071	undated	Organic Fluorocompounds in Blood ✓	Telomers Blood Data General
035	072	03/15/79	Letter from Sidney Pell to P. G. Gilby entitled "Chambers Works Fluorosurfactant Study" ✓	Chambers Works Telomers Blood Data
035	073	05/18/79	Chambers Works Fluorochemicals in Blood Study ✓	Chambers Works Telomers Blood Data
035	074	03/05/99	E-mail from Barbara J. Dawson to Carol S. Lyell entitled "1978-79 Chambers Works Organic Fluorine in Blood Monitoring Program" ✓	Chambers Works Telomers Blood Data
035	075	03/21/00	E-mail from Susan S. Miletic to Gerald L. Kennedy and Stephen H. Korzeniowski entitled "CW blood monitoring C-8 & total F" ✓	Chambers Works Telomers Blood Data
035	076	10/01/01	Worker Monitoring Summary ✓	Chambers Works Telomers Blood Data
035	077	12/09/04	Chambers Works Telomer Summary ✓	Chambers Works Telomers Blood Data
035	078	12/07/04	First Chemical Company Pascagoula, MS - Baseline Monitoring December 2003 ✓	Pascagoula Telomers Blood Data
035	079	05/30/02	Telomeres fluores Dosages sanguins ✓	Villers Saint Paul Telomers Blood Data

VOL	TAB	DATE	DESCRIPTION	CATEGORY
035	080	03/27/03	E-mail from Jim E. Pesek to Korzeniewski, Rickard and Masse entitled "Blood Monitoring at Villers Saint Paul ✓	Villers Saint Paul Telomers Blood Data
036	FLAIR Documents	11/09/04	Flair - Work and Medical Histories for All Employees and All Years ✓	FLAIR Blood Monitoring