

Gerald L Kennedy

04/19/2000 02:06 PM

To: Andrea Malinowski/DPL/DUP@DUP, Bernard J Reilly/AE/DuPont@DuPont, Stephen H Korzeniowski/DuPont@DuPont, Jim E Pesek/AE/DuPont@DuPont, Robert C Buck/DuPont@DuPont, Susan S Mileti/DuPont@DuPont, Robert F Pinchot/DEV/AE/DuPont@DuPont, Roger J Zipfel/AE/DuPont@DuPont, Judy Stadler/AE/DuPont@DuPont, Robert W Rickard/AE/DuPont@DuPont, Gary W Jepson/AE/DuPont

cc:

Subject: request for information on perfluorochemicals

E mail from EPA (which was also followed by a FAX) which needs immediate action. We need to identify a work group and a point person to get this accomplished. Thanks.

Forwarded by Gerald L Kennedy/AE/DuPont on 04/19/2000 01:58 PM

Auer.Charles@epamail.epa.gov on 04/19/2000 08:42:54 AM



To: Gerald L Kennedy/AE/DuPont
cc: Hernandez.Oscar@epamail.epa.gov, Patel.Neil@epamail.epa.gov, Leczynski.Barbara@epamail.epa.gov
Subject: request for information on perfluorochemicals

Dear Gerry,

As discussed on April 13 by phone, EPA needs to review complete copies of final reports and any other relevant information in your possession or control on carboxylated and sulfonated perfluorochemicals, with initial focus on PFOA (perfluoro octanoic acid). The requested information includes health effects studies (including pharmacokinetics), environmental effects studies, environmental fate studies and information, and human and environmental exposure studies and information, including monitoring. If final reports are not available, we request that you clarify the status of any ongoing studies with regard to projected completion date and provide us with the latest and most complete version of any preliminary reports in your possession or control.

We request that you provide us with the above information on PFOA by May 26, 2000. Regarding the sulfonated perfluorochemicals, our initial interest is focused on perfluorooctyl sulfonic acid (PFOS) and we request that you provide the above information on PFOS by April 28, 2000.

If you have any of the above information on other carboxylated or sulfonated perfluorochemicals, we request that, by April 28, 2000, you initially identify the chemicals to allow us to confirm our interest, and then provide the requested information in your possession or control on other sulfonated perfluorochemicals by May 19, 2000 and on other carboxylated

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perfluorochemicals
by a week later, May 26, 2000. The information on these additional chemicals
can
most usefully be provided in chemical specific increments as they are
completed,
with completion of the full submissions by the dates requested.

A few points of clarification regarding this request:

>duPont need not resubmit copies of studies already provided to EPA (e.g.,
under
TSCA §8(e), as FYIs, under FIFRA) although we do request that you provide a
comprehensive bibliography of the studies already submitted so we can check
this
against our holdings.

>copies of acute systemic toxicity studies can be limited to the key or
critical
studies as described in the Data Adequacy and robust summary guidance
developed
for the HPV Challenge Program. Under this approach all studies will be cited
in
a bibliographic listing although full copies can be limited to studies which
(1)
serve to identify lowest (i.e., most toxic) lethal dose values by different
routes or (2) report observed effects which differ from those seen in studies
(using the same route) submitted under (1).

>skin and eye irritation studies can be handled in a manner consistent with
that
outlined for acute systemic toxicity (i.e., submit copies of the key or
critical
studies which serve to set out the irritation potential of the chemical and
other irritation studies which show effects which differ from those reported
in
submitted studies).

>the initial request is generally limited to studies conducted during or after
1976. For studies conducted prior to 1976, we ask for a bibliography listing
all studies and for full copies of studies in the following endpoint areas:
genetic toxicity; subchronic toxicity; reproductive toxicity; developmental
toxicity; immunotoxicity; uptake/metabolism; chronic toxicity/carcinogenicity;
neurotoxicity.

>regarding exposure information, we are most interested in receiving
information
and data of the types found in the Use and Exposure Information Profile (UEIP;
the UEIP has been used to support SIDS assessments in the US) and information
on
results of exposure or monitoring studies (human and environmental), including
full copies of studies where available and including details on procedures and
methods used for sampling and analysis. We are also interested in studies
relating to the ultimate environmental fate and distribution of these
chemicals.

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In order to maintain the integrity of your submissions, please submit all information on a given chemical as a separate "For Your Information" (FYI) submission. You may also submit the information as supplements to any prior submissions by your company under TSCA §8(e) relating to these chemicals. As always, any CBI must be submitted in accordance with applicable procedures.

If

you have any questions with regard to the submission procedures, or you wish to work out the arrangements in advance, please contact Terry O'Bryan (202-260-3483).

If you have any general questions regarding this request, please contact me by email or phone (202-260-3749). I thank you in advance for your cooperation.

Charles M. Auer, Director
Chemical Control Division
Office of Pollution Prevention and Toxics/OPPTS/EPA

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Robert F Pinchot 05/11/2000 07:31 AM

To: David M Rurak/AE/DuPont@DuPont, Michael E McCord/AE/DuPont@DuPont, Robert J Cavanaugh/DuPont@DuPont, Luk D'Haenens/EUR/DuPont@DuPont, Roger J Zipfel/AE/DuPont@DuPont, Anthony J Playtis/CL/DuPont@DuPont, Arie J Vermeulen/EUR/DuPont@DuPont, Gerald L Kennedy/AE/DuPont@DuPont, William R Berti/AE/DuPont@DuPont, John Gannon/AE/DuPont@DuPont, Robert L Ritchey/CL/DuPont@DuPont, Andrew S Hartten/AE/DuPont@DuPont, Susan S Milet/DuPont@DuPont
cc: Andrea V Malinowski/AE/DuPont@DuPont, Maurice Astorga/AE/DuPont@DuPont, Richard J Angiullo/AE/DuPont@DuPont, Bernard J Reilly/AE/DuPont@DuPont, Gary W Jepson/AE/DuPont@DuPont
Subject: PFOA EPA Request

As many of you know, the Office of Pollution Prevention and Toxics in the US EPA has requested that DuPont supply a large amount of information on Perfluorooctanoate (PFOA or C-8). This information includes toxicity (human and environmental) data, environmental fate data, human exposure data, use data, and emission data. Some of this data needs to be submitted to the EPA by May 26th while the rest of the data will need to be in EPA's hands by June 23. To be able to collect all this data and get it into a form so that EPA can use it, I will need significant help from all of you. Specifically, I will need the following information:

- Purchase/Import history of C-8 in the US (Rurak, McCord)
- Sales History of dispersions in the US (McCord)
- Fate of C-8 in dispersions (Cavanaugh)
- Quantity of C-8 in dispersions (Cavanaugh)
- Fate of C-8 in finishes products (D'Haenens)
- Emissions history at WW by media including 1999 data (Zipfel)
- C-8 destruction and recycle rate at WW (Zipfel)
- Further reduction plans at WW (Zipfel)
- C-8 Air monitoring data (Playtis, Vermeulen)
- Blood sampling data analysis (Playtis, Vermeulen)
- Blood data from other DuPont sites, as available (Kennedy, Milet)
- Soil/sediment absorption study report (Berti)
- Bioconcentration factor and Bioaccumulation factor modeling/tests (Gannon) (Include Zonyl®)
- FS-62 tests/modeling for my information only).
- WW emission data reported to state/EPA (Ritchey)
- Groundwater information reported to EPA and state (Hartten)

Gerry Kennedy will be collecting the toxicity information that the EPA is requesting.

I will be contacting each of you either individually or in small groups to gather this data. Roger, Tony, Bob, I will plan to travel to WW during the week of May 22 to discuss the information that I need from you.

Best Regards,
Rob

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