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DuPont Haskell Laboratory  
for Health and Environmental Sciences  
Elkton Road, P.O. Box 50  
Newark, DE 19714-0050

November 23, 2004

Via Federal Express

8EHQ-1104-00394

Document Processing Center (Mail Code 7407M)  
Room 6428  
Attention: 8(e) Coordinator  
Office of Pollution Prevention and Toxics  
U.S. Environmental Protection Agency  
1201 Constitution Ave., NW  
Washington, DC 20460

8EHP-81-394

CONTAINS NO CBI

Dear 8(e) Coordinator:

8EHQ-0381-0394  
Ammonium Perfluorooctanoate

This letter is to inform you of the summary results (Attachment I) of a recently conducted blood sampling for the above referenced material in employees from our Washington Works facility in West Virginia. This exposure sampling is part of a larger ongoing study, "Ammonium Perfluorooctanoate: Cross-Sectional Surveillance Of Clinical Measures of General Health Status Related to a Serum Biomarker of Exposure and Retrospective Cohort Mortality Analyses in a Polymer Production Plant" of over 1,000 employees at our plant. This information has already been presented to EPA OPPT on November 10, 2004. These results are consistent with previously reported blood levels in workers. Individual blood sampling results, redacted for privacy reasons, will be provided to EPA on or before December 6, 2004.

In the course of discussions with OPPT and with the Office of Regulatory Enforcement, it has become clear to DuPont that those two offices are applying standards of reporting under TSCA Section 8(e) that DuPont cannot anticipate. Therefore, as a precaution DuPont is submitting the enclosed information to the Section 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 material.

A copy of the final report of the larger ongoing study referred to above will be submitted to the Agency when available.

Sincerely,

A. Michael Kaplan, Ph.D.  
Director - Regulatory Affairs and Occupational Health

AMK/RWR/RCL:clp  
(302) 366-5260

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## Distribution of Serum PFOA Levels By Current Work Assignment

Work Assignment	Serum PFOA (ppm)			
	Number in Group	Median	Min	Max
Teflon®	259	0.494	0.0174	9.55
Research/Technical	160	0.176	0.0081	2.07
Never assigned to Teflon®	342	0.114	0.0046	0.963
Assigned to Teflon® at some point	264	0.195	0.0086	2.59
Total Participants	1025			