The Chemours Company FC, LLC
Product Sustainability, Room 626-6
1007 Market Street
Wilmington, DE 19801
USA

March 17, 2021

Via CDX

Document Processing Center (Mail Code 7407M)
Room 6428
Attention: 8(e) Coordinator – FYI Letter
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
1201 Constitution Ave., NW
Washington, DC 20004

Dear 8(e) Coordinator:

Test Substance:

Propanoic acid, 2,3,3,3-tetrafluoro-2-(1,1,2,2,3,3,3-heptafluoropropoxy)-
CAS RN 13252-13-6
(also known as HFPO-DA)

This letter is to inform you of the results of a blood monitoring study with the above-referenced test substance. This information is provided to the TSCA 8(e) Office for information in view of the Agency's continued interest in perfluorinated substances and as a precautionary measure. As detailed below, an average approximate half-life of 81 hr was calculated based on this limited dataset.

Design:
Blood samples were collected from 25 volunteers before and after off-shift weekend at a production facility outside the US. The samples were processed to separate plasma from the red blood cell fraction. The plasma was then divided into three subsamples: one sample was analyzed by Charles River Laboratory, one sample was analyzed by Medizinisches Labor Bremen GmbH, and one sample was retained for potential analysis in the event of disagreement between the two analytical labs.

Details on Exposure:
During the same time frame as the blood monitoring campaign, twelve personal air samples were collected (December 7 – 10, 2020) from manufacturing process operators that are representative of routine exposure in fluoropolymer manufacturing operations. Personal air sample measurements were performed over the entire dayshift (8 hr) of the operator, but were started and stopped during lunch and during shift transfers. Personal exposure measurements were performed by drawing air over an OSHA Versatile Sampler (OVS-2) tube using air sampling pumps. This sampling media contains a quartz filter and XAD-2 sorbent resin (SKC: 226-30-16-BV), and is designed to capture both HFPO-DA and HFPO-DA, ammonium salt in air (with analytical results reported as HFPO-DA). Mean measured exposure was 0.0041 mg/m^3; standard deviation: 0.0022 mg/m^3.

Results:
There was good agreement between the plasma concentrations measured between both labs so the third sample was not utilized. Approximately 80% of the samples at the first time point contained a concentration of HFPO-DA above the limit of detection. These concentrations ranged from 0.6 to 25 µg/L with a mean of approximately 6 µg/L. Approximately 50% of the samples had measurable concentrations of HFPO-DA above the detection limit at

the second time point, which occurred between 72 and 96 hr after the first time point. The range of concentrations for this second sample was from 0.5 to 3 µg/L with a mean of approximately 2 µg/L. Samples that contained measurable amounts of HFPO-DA (i.e., above the limit of detection) at both time points were used to estimate a half-life assuming an exponential rate of decay. Thirty of the 50 measurements met this criterion. The estimated half-life using the assumption of exponential decay was approximately 81 ± 55 hr (mean and standard deviation). The range was 42 to 333 hr with a median of 66 hr.

Conclusions:
An average approximate half-life of 81 hr was calculated based on this limited dataset.

I hereby certify to the best of my knowledge and belief that all information entered on this form is complete and accurate.

I further certify that, pursuant to 15 U.S.C. § 2613(c), for all claims for confidentiality made with this submission, all information submitted to substantiate such claims is true and correct, and that it is true and correct that

(i) My company has taken reasonable measures to protect the confidentiality of the information;

(ii) I have determined that the information is not required to be disclosed or otherwise made available to the public under any other Federal law;

(iii) I have a reasonable basis to conclude that disclosure of the information is likely to cause substantial harm to the competitive position of my company; and

(iv) I have a reasonable basis to believe that the information is not readily discoverable through reverse engineering.

Any knowing and willful misrepresentation is subject to criminal penalty pursuant to 18 U.S.C. § 1001.

Please contact me if you have any questions about this submission or need further clarification.

Sincerely,

Dawn S. Clark

Dawn S. Clark, Ph.D.
US Chemical Management Leader
The Chemours Company FC, LLC
(302) 773-2621