#### EXHIBIT 34

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# Fluoropolymers in the Environment:

### EPA's Current Understanding of Sources and Pathways

### **December 9, 2003**

A "Road Map" for a Path Forward

## Proposed Path Forward

- understand sources of PFOA entering the environment and available thus far. Based on this review EPA identified outstanding data needs which would enable it to better EPA has reviewed its Data Needs Tables and the data pathways leading to human exposures.
- Some of EPA's Data Needs have been met by industry; others are included in LOI commitments or ECA proposals, and some are still outstanding.
- All of EPA's Data Needs are critical to understanding and prioritizing sources and pathways.

#### Proposed Path Forward (continued)

- to identify priorities for more extensive testing and and environmental pathways, and identifies basic describes EPA's current understanding of sources fluoropolymer data needs which will enable EPA This presentation is a "Road Map" which monitoring.
- This is an overall summary; the details of the data and EPA's Data Needs are described in the relevant dockets.

## Primary Questions

- fluoropolymer pathways and sources of PFOA EPA needs to better understand the potential before it is able to prioritize them.
- The tests identified in this presentation are designed regarding which sources and pathways are the most to answer some of the fundamental questions significant.
- Point source releases could result in levels that may be significant; additional information is needed to better understand these sources.

#### Commitments, and Outstanding ECA Tests Proposed, LOI Data Needs

- Incineration:
- Incineration testing to determine incineration byproducts (proposed ECA)
- Article testing:
- FMG will conduct testing on articles in commerce (LOI commitment)
- There is an agreement in principle on testing of aged articles (proposed ECA)

#### Commitments, and Outstanding ECA Tests Proposed, LOI Data Needs (continued)

- Article testing (continued):
- Thermal degradation data on fluoropolymers and processed fluoropolymer (solid) is also needed determination of PFOA FPA contamination of and could possibly be included in this testing. (outstanding data need)
- Monitoring:
- Manufacturing facilities: concentrations in air, surface soil, and additional biota (outstanding data need).

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#### Commitments, and Outstanding ECA Tests Proposed, LOI Data Needs (continued)

#### • Monitoring:

- Off-site from manufacturing facilities: air, concentrations), wastewater treatment and surface water, groundwater (background sludge, soil, and biota.
- Use facilities and off-site from these facilities: air, surface water, groundwater, wastewater, soil, sludges, and biota.

### Take Advantage of Available Information:

- chemical properties (particulate, vapor, etc.), used locations for groundwater samples) has also been Basic information (e.g., input and output values, in modeling conducted by industry, and x-y requested by EPA.
- evaluate the statements made regarding the need These data are needed so EPA can analyze and interpret the data submitted by industry and for additional monitoring.

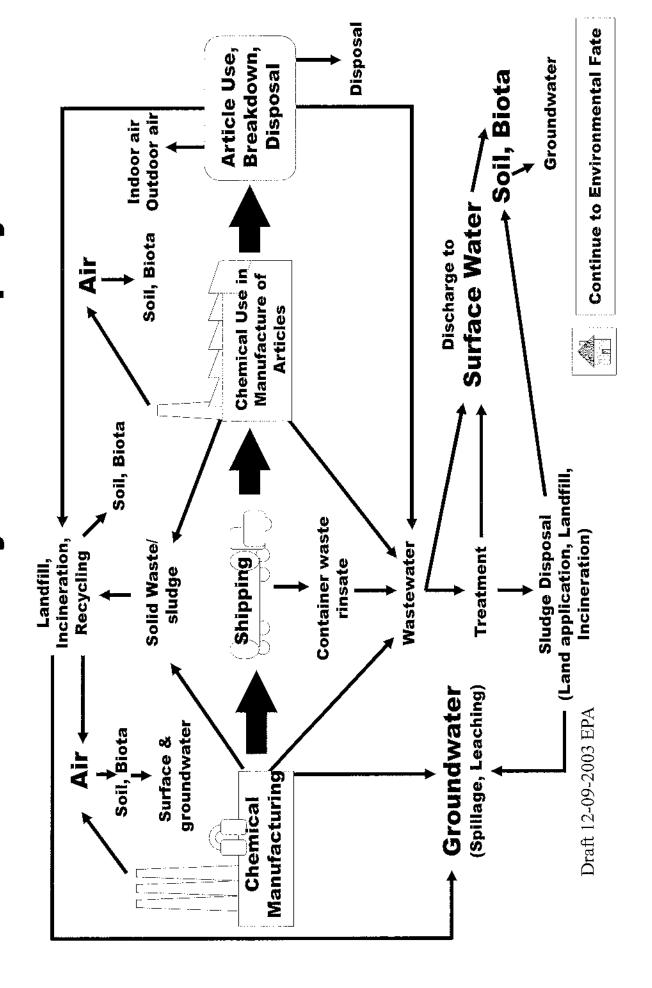
### Possible Future Data Needs -Examples

- Other tests as indicated from results of these tests or available data, for example:
- products (to be determined based on incineration Physical/chemical, fate and transport properties of incineration byproducts or of degradation results and thermal degradation data)
- More extensive monitoring (to be determined based on initial monitoring results)

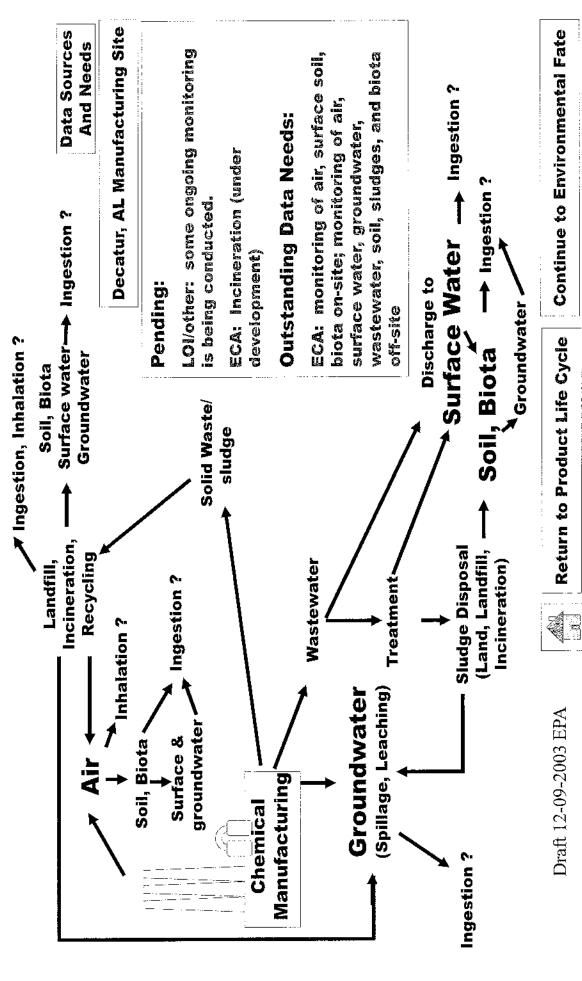
#### The Road Map Fluoropolymers:

A Summary of the Fluoropolymer Life Cycle; Potential Sources and Available, Pending, and Needed; Pathways; Data Which Are And EPA's Rationale for Additional Data Needs

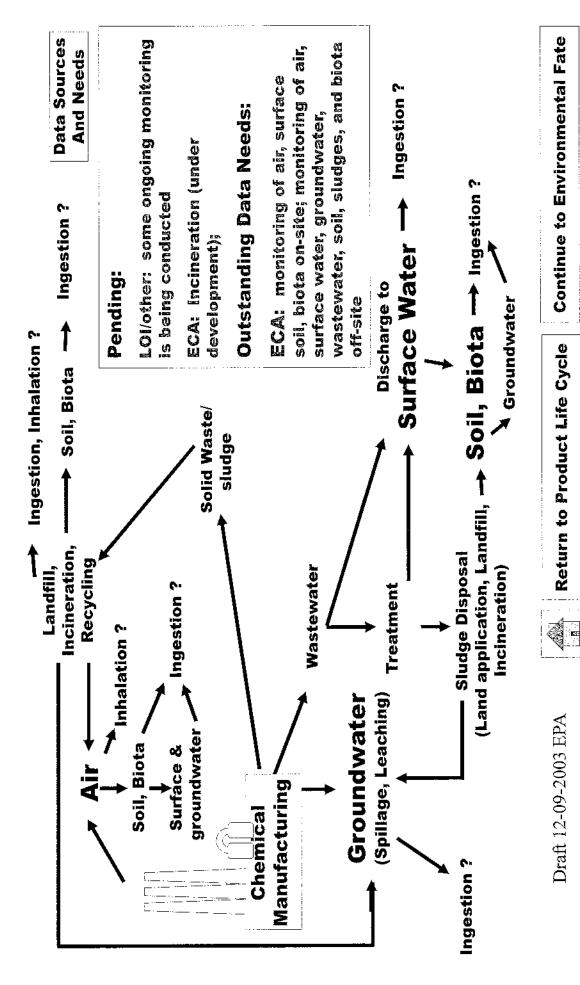
# Product Life Cycle: Fluoropolymers



#### **Manufacture of Fluoropolymers** (Parkersburg, WV Facility)



#### **Manufacture of Fluoropolymers** (Decatur, AL Facilities)



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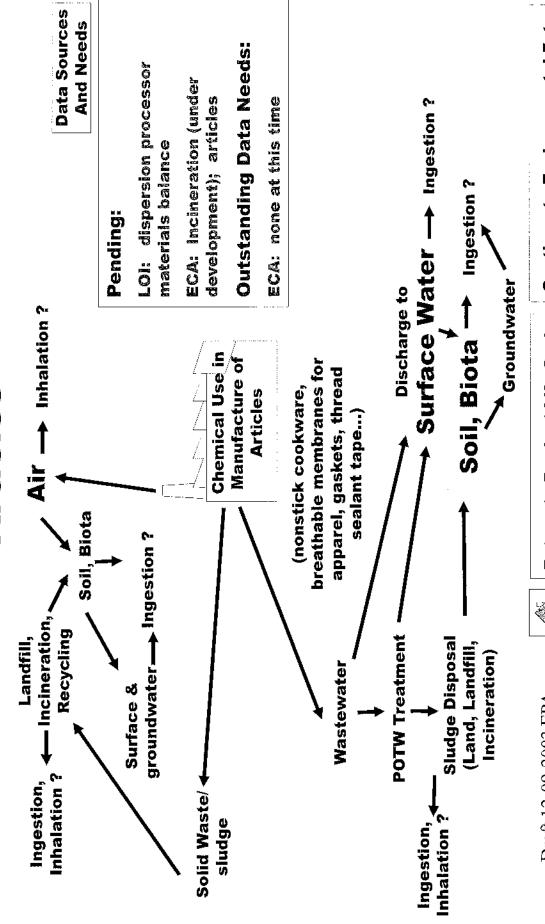
Return to Product Life Cycle

**Continue to Environmental Fate** 

### Shipping of Fluoropolymers from the **Manufacturer to Customers**

Data Sources **And Needs Outstanding Data Needs:** ECA: none at this time Ingestion? Ingestion? ECA: none Loi: none Pending: **★** Groundwater Soil, Biota → Surface Water Discharge to (Land application, Landfill, Ingestion? **POTW Treatment** Sludge Disposal **Container waste** Incineration) Wastewater Shipping rinsate

### Manufacture of Fluoropolymer-Treated **Articles**

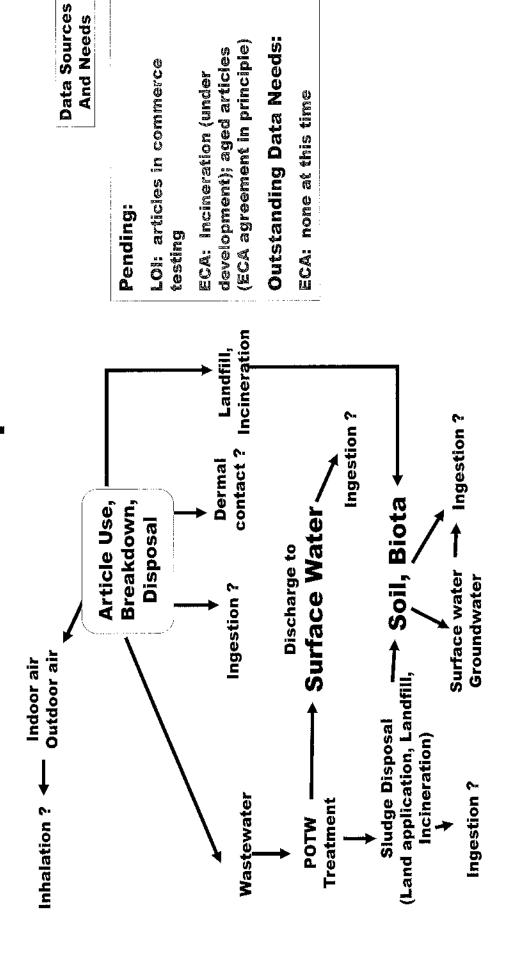


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### Fluoropolymers: Article Use, Breakdown, and Disposal



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## **Environmental Fate: Water**

#### **Available Data**

Little information on the environmental fate of fluoropolymers is available. However, under chemically and environmentally rigorous conditions, and what is known about fluoropolymer degradation in water is not expected to be a significant source of based on the structure of fluoropolymers, information provided on their stability the behavior of other high molecular weight synthetic organic polymers,

# Pending/Expected Data via LOI or Proposed ECA

None.

### Additional Data Needed via ECA

None at this time,

## **Environmental Fate: Air**

#### **Available Data**

significant distance. EPA needs additional information to determine whether air is a described elsewhere in this presentation, but EPA needs additional information on significant pathway for fluoropolymers. Air modeling has also been conducted, as study, while limited, indicates that PFOA may be transported in the atmosphere a indicate that PFOA can move up to 800 km after being released to the air. This transport and deposition model has been conducted. Results of the evaluation A screening assessment of long-range atmospheric transport using a simple the modeling input and output parameters to evaluate the study.

## Pending/Expected Data via LOI or ECA

None.

## Additional Data Needed via ECA and Rationale

No additional data on the environmental fate of PFOA in air is needed at this time.

#### **Available Data**

address the complex soil media. The Agency believes that soil may be an important Little information on the environmental fate of PFOA in soil is available. Adsorption monitoring data to better understand this pathway and the relevant sources of soil pathway for human exposure to PFOA, and is requesting additional surface soil studies in soil are available, but the studies are limited and do not sufficiently contamination. References

# Pending/Expected Data via LOI or Proposed ECA

None.

## Additional Data Needed via ECA and Rationale

time, however, surface soil testing is needed in order to understand whether soil is a No additional information on the environmental fate of PFOA in soil is needed at this significant pathway for exposure to PFOA.



Perfluorooctanoate to Soil (OECD 106)" Study conducted at E.I. du Pont de Nemours and Company site in Newark, DE, Report number EMSER 17-03, Dekleva, Lynn (2003) "Adsorption/Desorption of Ammonium

Welsh, Stephen (1978) "Adsorption of FC 95 and FC 143 on soil," Report 1, Project 9970612633, February 27, 1978. (AR226-0488) U.S. EPA, Soil Screening Guidance: Users Guide. EPA Publication 9355.4-23, July 1996.

835.1220 Sediment and Soil Adsorption/Desorption Isotherm, EPA 712-C-96-048, U.S. EPA, Fate, Transport and Transformation Test Guidelines, OPPTS

Organization for Economic Cooperation and Development (OECD) (2003). Adsorption/desorption of ammonium perfluorooctanoate to soil, OECD 106 test guideline. EMSE study number T0111/14107, report number 17-03.

#### Information and Specific Information at the **Manufacture of Fluoropolymers: General** Parkersburg, WV Facility

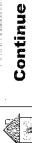
#### **Available Data**

Fluoropolymers, Daikin, DuPont, and Dyneon. Fluoropolymers are manufactured by DuPont at the Washington Works facility in Parkersburg, WV, and by Daikin at the Decatur, AL facility. DuPont is the only U.S. manufacturer of APFO which is Fluoropolymer Manufacturers Group (FMG) members include Asahi Glass used to make fluoropolymers. References

manufacturing process, facilities, locations, uses/applications of fluoropolymers, Information on the basic physical/chemical properties of the fluoropolymers, the (LOI Commitment) Much of this information is CBI, however, FMG has provided CAS #, chemical names, synthetic sequences, and production/import volumes. detailed, non-CBI information on fluoropolymer use categories, and some companies have provided non-CBI plant location References

annual release data for the Parkersburg, WV facility which provides information on released. This provides an understanding of potential pathways at manufacturing EPA also has some materials balance information for one facility. EPA also has the amount of PFOA released, the compartments to which the materials are

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Return to Fluoropolymer Manufacture

### Manufacture of Fluoropolymers at the Parkersburg, WV Facility (continued)

### **Available Data (continued)**

detected in a variable pattern within a 2 mile radius of the facility in groundwater. ppb range. Only two off-site soil samples were analyzed; these detected levels of soil samples in other areas not associated with waste disposal were in the 10-50 Results from several DuPont-sponsored studies of the Washington Works facility High levels (ppm) were detected in soil associated with waste disposal. On-site and surrounding area are also available. In summary, ppb levels of PFOA were 110 and 170 ppb in the Little Hocking well field, approximately 1 mile off-site.

and other available information and disagrees. DuPont believes that air deposition PFOA was not detected upstream of the outfall. Local public water supplies were predict where to conduct groundwater monitoring. EPA has looked at the results ISCST3 has also been conducted, and DuPont believes the results can be used to followed by rapid migration through the soil to groundwater is the major route of In surface water, low to sub- ppb levels were found downstream of the facility. also tested, and low ppb to sub-ppb levels were detected. Air modeling using the contamination. EPA needs additional data on this pathway to determine whether this theory is supportable. References

## Manufacture of Fluoropolymers at the Parkersburg, WV Facility (continued)

# Pending/Expected Data via LOI or Proposed ECA

understand the modeling and monitoring and DuPont's interpretation of the data. Additional data (location of monitoring wells and soil samples, and input and output files for air modeling) has been requested to enable EPA to better

Incineration Analysis - ECA Proposal is being drafted; anticipate results roughly 18 months from start of the test, based on similar studies.

## Additional Data Needed via ECA and Rationale

needed. Very little off-site data are available to the Agency, and thus, the extent of the contribution of these point sources to the general population exposures is At manufacturing facilities, monitoring of air, surface soil, and biota are needed. Off-site from these facilities, monitoring of concentrations in air, surface water, groundwater (background), wastewater treatment and sludges, and biota are largely unknown.

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## Manufacture of Fluoropolymers at the Parkersburg, WV Facility (continued)

Additional Data Needed via ECA and Rationale, continued

enable EPA to determine the potential for these point sources to impact the These data are needed to better understand the pathway from air transport and deposition onto soil followed by migration to groundwater. This would general population.

### References: General Fluoropolymer and Parkersburg, WV Site

Industry, to Stephen L. Johnson, Assistant Administrator, OPPTS, EPA, March 14, APFO Users Letter of Intent, "Voluntary Actions to Evaluate and Control Emissions of Ammonium Perfluorooctanoate (APFO). The Society of the Plastics

DuPont de Nemours and Company. Voluntary Use and Exposure Information Profile for Ammonium Perfluorooctanoate (APFO), Undated. AR226-0599.

3M Company (2003) Letter from Michael Santoro and George Millet to Document Control Officer, OPPT, EPA on the subject of P-Chem Properties for

perfluorocarboxylic acids by gas-liquid chromatography in rat tissues." Toxicity Kudo, Naomi, Naoki Bandai, Yoichi Kawashima, "Determination of Letters, 99 (1998) 183-190.

perfluorooctanoic acid ammonium salt in human serum by high-performance liquid spectrometry," Rapid Communications in Mass Spectrometry 16 (2002) 650-654. Sottani, Christina, and Claudio Minoia, "Quantitative determination of chromatography with atmospheric pressure chemical ionization tandem mass

Flaherty, John, and Karen Risha, Method of Analysis for the Determination of Ammonium Perfluorooctanoate (APFO) in Water Revision 1, Exygen Research, State College, PA. January, 2003.

Field; Washington County, Ohio, Project number 748218983762.00010, April, 2003. Diamond), Sampling Investigation Results Little Hocking Water Association Well Corporate Remediation Group (An Alliance between DuPont and URS (AR226-1416).

Diamond), Groundwater Investigation Quality Assurance Project Plan For Washington Corporate Remediation Group (An Alliance between DuPont and URS Works Plant, Project number D6WW7423.01, January, 2002.

DuPont Fluoroproducts, Ammonium Perfluorooctanoate (C-8) Groundwater Investigation Steering Team Report, Consent Order No. GW-2001-019, August, 2003.

Washington Works Facility and Local Letart And Dry Run Landfills; Project number Corporate Remediation Group (An Alliance between DuPont and URS Diamond), C-8 Data Summary Report; Consent Order GWR-2001-019, DuPont 742318983635, February, 2003. (AR226-1415)

Washington Works Facility and Local Letart And Dry Run Landfills; Project number Corporate Remediation Group (An Alliance between DuPont and URS Diamond), C-8 Data Summary Report; Consent Order GWR-2001-019, DuPont 742318983635, February, 2003. (AR226-1415)

Department of Environmental Protection on the subject of: 2003 Public Water Supply Results, West Virginia and Ohio DuPont Washington Works, Washington, WV, June 25, DuPont (2003) Letter from Andrew Hartten to David Watkins, West Virginia 2003, (AR226-1417)

Washington, Wood County, West Virginia, Environmental Response Team Center, Office of Emergency & Remedial Response, November, 1997. (AR226-1474) Sprenger, Mark, and Michael Horne, Draft Report, Dry Run Creek;

Investigation Steering Team Report, Consent Order No. GW-2001-019, August, 2003. DuPont Fluoroproducts, Ammonium Perfluorooctanoate (C-8) Groundwater

Diamond), Site Screening Level Assessments for PFOA and the Relevance of Soil Corporate Remediation Group (An Alliance between DuPont and URS Sampling, Project number 18983753.00034, October 20, 2003.

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Corporate Remediation Group (An Alliance between DuPont and The W-C Diamond Group), RCRA Facility Investigation Report; DuPont Washington Works; Washington, West Virginia; USEPA Permit Number WVD04-587-5291, Project number 0D6W7205, June 30, 1999.

Diamond), Compilation of Historical C-8 Data; DuPont Washington Works; Main Corporate Remediation Group (An Alliance between DuPont and URS Plant and Landfills; Project number D6WW7423, January, 2002.

Users LOI dated March 14, 2003: Air Dispersion Modeling Reports, October 20, **DuPont Progress Report on Environmental Assessments Pursuant to the APFO DuPont (2003) Letter from David Rurak to Document Control Officer,** OPPT, EPA on the subject of: Follow-up to September 15, 2003 Submission of

PFOA Levels in Air and Water, Project number 50850118983843.00003, September, Corporate Remediation Group (An Alliance between DuPont and URS Diamond), DuPont Telomer Manufacturing Sites: Environmental Assessment of

Washington Works Facility and Local Letart And Dry Run Landfills; Project number Corporate Remediation Group (An Alliance between DuPont and URS Diamond), C-8 Data Summary Report; Consent Order GWR-2001-019, DuPont 742318983635, February, 2003. (AR226-1415)

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Drobny, J.G. (2001). Technology of Fluoropolymers. Boca Raton, FL.: CRC Press. 172 pp.

Schiers, J. (Ed.) (1997). Modern Fluoropolymers: High Performance Polymers for Diverse Applications. Chichester: Wiley & Sons. 637 pp.

stability based ranking of hazardous organic compound incinerability. Environ Taylor PH, Dellinger B, and Lee CC (1990). Development of a thermal Sci Technol 24:316-328.

decomposition of pefluoroalkanesurfonyl fluorides: The pyrolysis of perfluoro-n-Napoli, M., Fraccaro C, Scipioni A, and Armelli R (1984). Thermal octane-1-sulfonyl fluoride. Journal of Fluorine Chemistry, 24: 377-385.

Tsang W, Burgess DR, and Babushok V (1998). On the incinerability of highly fluorinated organic compounds. Combustion Science and Technology 139:385-402.



### Manufacture of Fluoropolymers at the Decatur, AL Facility

#### **Available Data**

upgradient wells. Contaminant plumes have been detected at the facility and at groundwater, PFOA was detected at ppm levels near the facility, including some tissue near the facility outfall and in areas downstream; some fish collected Several studies of PFOA contamination in the vicinity of the Decatur facility. PFOA has been detected in wastewater, surface water, sediment, and fish upstream of the outfall had measurable PFOA concentrations as well, In References a nearby landfill.

additional information in order to better understand the results. References facility, but the data have not undergone a rigorous analysis and EPA needs A limited amount of air modeling data have been generated for the Decatur

# Pending/Expected Data via LOI or Proposed ECA

Ongoing monitoring at the facility is being conducted and the Agency expects to receive this data when it becomes available.

## Manufacture of Fluoropolymers at the Decatur, AL Facility (continued)

## Additional Data Needed via ECA and Rationale

Manufacturing facilities and off-site from these facilities: concentrations sludges, and biota. Very little off-site data are available to the Agency, in air, surface water, groundwater, wastewater, landfill leachate, soil, and thus, the extent of the contribution of these point sources to the general population exposures is largely unknown.

This would enable EPA to determine the potential for these point sources transport and deposition onto soil followed by migration to groundwater. These data are needed to better understand the pathway from air to impact the general population.

### References: Fluoropolymer Manufacture Decatur, AL Site

Entrix, Inc. A Survey of Selected Fluorochemicals in the Decatur Alabama Area 2002 Sampling, prepared for 3M, St. Paul, Minnesota, July, 2003.

Officer, OPPT, EPA on the subject of: Submission of Monitoring Data Pursuant to the 3M LOI dated March 13, 2003 and APFO Users LOI dated March 14, 2003, August 1, 3M Company (2003) Letter from Michael Santoro to Document Control

Alabama Department of Environmental Management, National Pollutant Discharge Elimination System Permit, Daikin America, Inc. (AL0064351) no date. DuPont (2003) Letter from David Rurak to Document Control Officer, OPPT, Progress Report on Environmental Assessments Pursuant to the APFO Users LO EPA on the subject of: Follow-up to September 15, 2003 Submission of DuPont dated March 14, 2003; Air Dispersion Modeling Reports, October 20, 2003.

Daikin (2003) Letter from Randy Roussel to Document Control Officer, OPPT, EPA on the subject of: Progress Report on Monitoring Efforts at Daikin America, Inc. Decatur Facility, September 15, 2003. 3M Environmental Laboratory, Environmental Monitoring - Multi-City Study; Water, Sludge, Sediment, POTW Effluent and Landfill Leachate Samples. June 25,

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### Shipping From Fluoropolymer **Manufacturer to Customers**

#### **Available Data**

EPA has no information on what types of containers are used, and how the shipping containers are handled.

# Pending/Expected Data via LOI or Proposed ECA

date of 2Q 2004, should provide some information on amount of container waste The Dispersion Processor Materials Balance Study, with a targeted completion for dispersions.

### Additional Data Needed via ECA

None at this time.

#### Fluoropolymers: Article Manufacturing

#### **Available Data**

There are two broad uses of fluoropolymers: a) solid polymer which is ultimately PFOA used to stabilize the emulsion. The dispersions are applied onto the article molded to form articles, and b) fluoropolymer dispersed in a liquid matrix, with and the article is heated to drive off PFOA and to impart favorable properties.

# Pending/Expected Data via LOI or Proposed ECA

environmental releases during dispersion processing. The target date for Dispersion Materials Balance Study will assess the potential for APFO completion of the study is 2Q 2004.

### Additional Data Needed via ECA

the Agency to determine whether these facilities are significant sources of PFOA. groundwater, wastewater treatment and sludges, and biota is needed to enable Monitoring on-site and off-site of concentrations in air, soil, surface water,



#### **Article Use/Breakdown/Disposal** Fluoropolymers:

#### Available Data

burned fluoropolymers and detected PFOA. However, thermal degradation data EPA has information on the thermal breakdown of PFOA. The study authors fluoropolymers, including information on solvents and their impact on were not included in this study. EPA also has basic information on fluoropolymer materials.

# Pending/Expected Data via LOI or Proposed ECA

using water and other extraction solvents as appropriate, using LC/MS/MS analysis membranes for apparel, household cookware, plenum cable and thread sealant balance method and a method proposed by FMG to determine the potential for tape using a solvent that is identified by a solvent comparison test, in a mass industrial articles of commerce using FDA Guidance for Industry (April 2002), and the Exygen method. In addition, a proposed ECA is under discussion and there is an agreement in principle. The proposed ECA will address testing generation of PFOA and characterization of release of PFOA from articles. FMG has committed under its LOI to test high and low heat consumer and

#### Article Use/Breakdown/Disposa **Fluoropolymers:** (continued)

## Additional Data Needed via ECA and Rationale

the article testing proposed, but EPA needs additional information to determine Thermal degradation data are needed. This testing may be incorporated into whether the testing will be adequate.

This testing would determine the level at which fluoropolymers may thermally degrade in routine use and reasonably foreseeable misuse of articles.



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#### **Article Use/Breakdown/Disposal** References:

atmospheric fluoroacid precursors evolved in the thermolysis of fluoropolymers" The Ellis, David, Jonathan Martin, Derek Muir, and Scott Mabury, "The use of <sup>19</sup>F NMR and mass spectrometry for the elucidation of novel fluorinated acids and Analyst 128 (2003) 756-764.

Dionex Corp. (2000). Accelerated solvent extraction (ASE) of additives from polymer materials. Application Note 331.

small-scale emission chamber determinations from indoor materials/products. ASTM American Society for Testing and Materials (ASTM). Standard guide for D-5116-97. Available at www.astm.org.

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Submitted with a cover letter from Don Duncan, The Society of the Plastics Industry, APFO Users (2003). APFO Users Letter of Intent, "Voluntary actions to to Stephen L. Johnson, Assistant Administrator, OPPTS, EPA. March 14, 2003. evaluate and control emissions of Ammonium Perfluorooctanoate (APFO)."

## Fluoropolymers: Biota

#### Available Data

is a useful study, but the number of samples collected was very small compared to EPA has reviewed biota data in wildlife from Japan and Korea, in a limited study of sample, two apple samples, one bread sample, and two ground beef samples. This Pensacola, FL; Cleveland, TN; and Port St. Lucie, FL. For each city, six samples of PFOS (but not PFOA) was detected in milk. PFOA was detected in one green bean basket study included food purchased in Mobile, AL; Columbus, GA; Decatur, AL; samples for each food type. Purchase times and food origins were uncertain for chicken, eggs, milk, bread, hot dogs, fish, and ground beef. This yielded 36 total other studies (e.g., Pesticide Data Program) which are used to provide reliable problems, and from a market basket study also conducted by 3M. The market each of the following types of food were sampled: green beans, apples, pork, all samples. PFOA was not detected in chicken, pork, eggs, hot dogs, or fish. alfalfa collected from the site of a 3M facility which encountered analytical results about the nation's food supply. References

# Pending/Expected Data via LOI or Proposed ECA

## Additional Data Needed via ECA and Rationale

EPA is consulting our internal experts to evaluate these studies and will then prepare an Agency review of the data, including whether additional data are needed via an ECA and rationale.



Sanderson, Hans, Timothy Boudreau, Scott Mabury, Keith Solomon, "Impact of perfluorooctanoic acid on the zooplankton community in indoor microcosms." Aquatic Toxicology, 63 (2003) 227-234.

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performance liquid chromatography" Journal of Chromatography 720 (1998) 1-7. "Determination of perfluorinated carboxylic acids in biological samples by high-Ohya, Takeshi, Naomi Kudo, Erika Suzuki, Yoichi Kawashima,

Perfluorooctane Sulfonate in Wildlife" Environmental Science & Technology, 35 Giesy, John P. and Kurunthachalam Kannan, "Global Distribution of (2001) 1339-1342.

Pesticide Data Program. Annual Summary Calendar Year 2001. February 2003. U.S. Department of Agriculture.



Eating Water Birds Including Bald Eagles and Albatrosses" Environmental Science & Kannan, Kurunthachalam, J. Christian Franson, William W. Bowerman, Kris J. Hansen, Paul D. Jones, and John P. Giesy, "Perfluorooctane Sulfonate in Fish-Technology, 35 (2001) 3065-3070.

Evans, Jay F. Gorzelany, Kris J. Hansen, Paul D. Jones, Eero Helle, Madeleine Nyman, and John P. Giesy, "Accumulation of Perfluorooctane Sulfonate in Marine Mammals" Kannan, Kurunthachalam, Jaana Koistinen, Kimberlee Beckmen, Thomas Environmental Science & Technology, 35 (2001) 1593-1598.

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#### References: Air

Long-Range Atmospheric Transport of perfluorooctanoic acid, Solvay Franklin, James, Screening Assessment of the Potential for Research & Technology, March 24, 2002.



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