

CC: Manufacturing Superintendents  
Process Superintendents  
Maintenance Superintendents  
Chief Chemist  
Research Superintendents  
Power & Services Superintendent  
J. R. Farmer, Construction

December 15, 1981

TO: FLUOROPOLYMERS SUPERVISION  
FROM: R. J. BURGER 

C-8 (FC-143) STATUS REPORT

On April 1 we advised you that 3M, in a preliminary study, had observed birth defects in the eyes of unborn rats when C-8, also known as FC-143 or ammonium perfluorooctanoate, was fed to pregnant female rats. Based upon those findings, we decided it was necessary to exclude female employees of childbearing capability from areas where there is potential for exposure to C-8.

We indicated that further studies by DuPont and 3M would be undertaken promptly to determine the significance, if any, of the findings as they might relate to employee exposure. We would like to share with you the results from these studies that we have to date.

Thus far, based on our review of the results of these further studies, it does not seem that the observed effects in the eyes of the unborn rats were due to C-8. Also in the new studies, rat pups delivered by C-8 exposed females showed no eye defects. Rather, it is believed that in the original studies, 3M's technique for the very difficult job of preparing the fetal eye tissue for microscopic examination resulted in the alterations noted.

3M has another toxicological test underway that will be completed the first quarter of 1982. At that time we expect to have all the data available and will assess if it is necessary to continue excluding female employees of childbearing capability from areas of potential exposure.

Until a final determination is made, we continue to advise that employees defer giving blood until the blood level of C-8 returns to background levels. We also advise that females who have an organic fluorine level above background should consult with their personal physician prior to contemplating pregnancy. We will provide pertinent information we have on C-8 to employees' personal physicians.

:ckc  
Attachment  
Ref:3962A

EID089462

DDJ001720

## QUESTIONS AND ANSWERS

(To be used by supervision as needed to answer questions.)

If there are any questions not answered below, they should be referred to Plant Management.

Q1 - Will women who left the area be allowed to return if they choose?

A1 - Not at the present time. This will be re-assessed in early 1982 when further toxicology tests are completed.

Q2 - Well, what if you decide it's okay for women to work in the area? How will the women who left get back in?

A2 - If it is finally determined that C-8 is not a teratogen, then females of childbearing capability will be allowed to return to the area. We are reviewing the procedure for return and will have an answer by the time the final studies are completed.

Q3 - What will the Company do for those female employees who decided to become sterilized?

A3 - We strongly recommended against sterilization for job-related reasons. Each woman was told that her employment, her pay rate, and her benefits would be fully protected and there was no need to consider a surgical procedure. Any decision for surgery was a personal matter, and the Company cannot assume responsibility for it.

Q4 - It looks like the people in the laboratories may have fouled up. What do you say to that?

A4 - The people at 3M conducting the experiments had the responsibility of trying to relate the effects seen in animals to those that might occur in humans. They needed to be very cautious. In this case in the preliminary study, they believed they saw an abnormal effect. They are required by law to report the preliminary results even though, as in this case, they knew further testing was required.

Q5 - Why did you act on just the preliminary study instead of waiting for final results?

A5 - We recognized that the test was preliminary, but it was a precaution we took until results of all follow-up studies were available.

EID089463

DDJ001721