



Ronald W. Evans
Director, Global Supply Chain
Technical Polymers

October 29, 2007

The Honorable Stephen L. Johnson
Administrator
The United States Environmental Protection Agency
1200 Pennsylvania Avenue (1101A)
Washington, DC 20460

Re: Arkema Inc. 2006 update reporting for EPA 2010/2015 PFOA Stewardship Program

Dear Administrator Johnson:

Arkema Inc. herewith submits its 2006 update report on emissions and product content as part of EPA's 2010/2015 PFOA Stewardship Program. Due to the critical nature of this information from a competitive standpoint, Arkema is able to make only the summary data publicly available. Arkema is continuing to work to reduce emissions and product content of perfluorinated compounds consistent with the Stewardship Program. .

Very truly yours,

A handwritten signature in blue ink, appearing to read "Ron Evans", written over a faint, light-colored background.

Ronald W. Evans
Director, Global Supply Chain
Technical Polymers

Arkema Inc.
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2010/15 PFOA Global Stewardship Program

Company Report: Summary of Baseline Emissions and Product Content

SECTION 1: REPORT DATE	October 2007
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SECTION 2: COMPANY IDENTIFICATION	
2a	Company Name Arkema Inc. <hr/> Street Address 2000 Market Street Philadelphia, PA 19103

SECTION 3: SUMMARY OF EMISSIONS					
Reporting Period (use calendar year - e.g. Jan 1, 2000 to Dec 31, 2000)			Jan 1, 2006 to Dec 31, 2006		
3a	Operations	Chemical category	Releases to all environmental media from fluoropolymer and telomer manufacture		
			kgs	$\frac{\text{kgs of category}}{\text{kgs of fluoropolymers}^1}$	$\frac{\text{kgs of category}}{\text{kgs of telomers}}$
3b	U.S. facilities	PFOA, PFOA salts and higher homologues	> 1,000 – 10,000	> 0.001 – 0.01	NA
		Precursors	NA	NA	NA
3b	Non-U.S. facilities	PFOA, PFOA salts and higher homologues	> 1,000 – 10,000	> 0.001 – 0.01	NA
		Precursors	NA	NA	NA
3c	Please provide information on the methods, assumptions, uncertainties and detection limits for the data provided above.				
	For each chemical category, the quantity of chemical released was determined for each process using mass balances, engineering calculations, and actual measurements of the chemical. The total quantity released is the sum of releases from the different processes. The margin of error for the total quantity released for all of the chemical categories is approximately +/- 5%.				

SECTION 4: SUMMARY OF PRODUCT CONTENT					
Reporting Period (use calendar year - e.g. Jan 1, 2000 to Dec 31, 2000)			Jan 1, 2006 to Dec 31, 2006		
4a	Product type		Fluoropolymer dispersions	Other fluoropolymers ¹	Telomer based products
	Production volume (kgs/year) ²		> 10,000 kgs – 100,000 kgs	Over 1,000,000 kgs	NA
4b	Operations	Chemical category	Concentration ³		
			Fluoropolymer dispersions ⁴ (ppm wet-weight)	Other fluoropolymers ^{1,5} (ppb dry-weight)	Telomer based products ⁶ (ppb dry-weight)
	U.S. facilities	PFOA, PFOA salts and higher homologues	> 500 ppm – 1,000 ppm	> 70,000 ppb - 150,000 ppb	NA
		Precursors	NA	NA	NA
4c	Non-U.S. facilities	PFOA, PFOA salts and higher homologues	NA	> 70,000 ppb - 150,000 ppb	NA
		Precursors	NA	NA	NA
4d	Please provide information on the methods, assumptions, uncertainties and detection limits for the data provided above.				

¹ Fluoropolymers manufactured with PFOA or related chemicals.

² Use the following ranges: (1) Zero (2) > 0 – 10 kgs; (3) > 10 kgs – 100 kgs; (4) > 100 kgs – 1,000 kgs; (5) > 1,000 kgs – 10,000 kgs; (6) > 10,000 kgs – 100,000 kgs; (7) > 100,000 kgs – 1,000,000 kgs; (8) Over 1,000,000 kgs.

³ Concentration should reflect the concentration of chemical in the product as sold by the reporting company. If the reporting company has information concerning the concentration of chemical in the product as used by others – for example, as incorporated by dilution into a formulation – that additional information would also be helpful.

⁴ This value should be expressed as a weighted average concentration and range.

⁵ This value should be expressed as a maximum concentration.

⁶ This value should be expressed as a simple (not weighted) average and range.