Colin C. Mackay President NAFTA Region



February 28, 2006

By Overnight Mail

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

Dear Administrator Johnson:

This letter is in response to your request for industry participation in the 2010/15 PFOA stewardship program, a voluntary emissions reduction initiative for perfluorooctanoic acid (PFOA). Ciba Specialty Chemicals commits to fully participate in the program.

As a Responsible Care[®] Company, Ciba is dedicated to the responsible and ethical management of the health, safety and environmental aspects of our products throughout their life cycles. While we do not manufacture PFOA or use it in any of our manufacturing processes, some of our products are made with fluorotelomers that may contain trace level quantities of PFOA as an impurity. Although these levels are extremely low, Ciba has already taken proactive steps to improve our processes and reduce these trace levels of PFOA even further. We feel that our proactive measures have already brought us close to the reduction goals outlined in the 2010/15 PFOA stewardship program.

Ciba Specialty Chemicals' Commitment

Ciba Specialty Chemicals is committed to eliminate where possible or severely restrict environmental emissions of PFOA and its potential precursors from Ciba Specialty Chemicals facilities, processes and products so that any residuals are reduced to the maximum reasonable extent possible. Elements of the program will include:

 Recognizing that we only have trace levels of PFOA in our products, by 2010 we will reduce PFOA emissions from our products by 95% compared with the baseline year 2002. This incorporates a reduction of more than 90% that has already been achieved via the implementation of a new end of pipe technology;

- Notwithstanding the fact that we do not manufacture or use PFOA at any of our manufacturing sites, we will agree to establish emission caps at all of our manufacturing sites globally to minimize absolute mass emissions of these raw material impurities;
- We will continue to investigate the environmental fate of our products;
- As an innovative company we will continue research into alternative technologies;
- We commit to working toward the elimination of PFOA and its potential precursors from Ciba Specialty Chemicals facilities, processes and products by no later than 2015;
- We will provide our baseline numbers for emissions and product content by October 31, 2006 and will submit annual reports on our progress in October of each subsequent year.

At Ciba Specialty Chemicals, we take our product stewardship obligations very seriously. This includes the environment, worker health and safety and the safety of customers and end-users of our products. We welcome the opportunity to work with the Environmental Protection Agency to achieve the goals of the 2010/15 PFOA stewardship program.

Sincerely,

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Colin C. Mackay President Ciba Specialty Chemicals, NAFTA Region

Copy by Overnight Mail to: Charles M. Auer Director U.S. EPA Office of Pollution Prevention and Toxics 1200 Pennsylvania Avenue, NW (7401M) Washington, DC 20460