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January 25, 2006

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

Re: DuPont Commitment to 2010/15 PFOA Stewardship Program

Dear Mr. Administrator:

This letter is in response to your request for industry participation in a voluntary emissions reduction program for perfluorooctanoic acid (PFOA), the 2010/15 PFOA Stewardship Program. DuPont commits to fully participate in this program.

As you know, our company has an expansive global program to reduce potential public exposure to PFOA and has already nearly achieved many of the reduction goals enumerated in your program. The description of our commitment follows and we look forward to working with you to move this program ahead.

DuPont's Commitment

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

- Reducing global PFOA emissions from manufacturing facilities by 98% by year end 2007. This incorporates the substantial achievement of 94% reduction already realized through DuPont's ongoing reduction program;
- Reducing global emissions of PFOA precursors and related higher homologues from fluorotelomer manufacturing by 97% by year end 2007;
- Establishing emission caps for U.S. facilities to limit the absolute number of pounds emitted, consistent with these reductions;
- Implementing product content caps for PFOA in fluoropolymer dispersions;

- Reducing product content of PFOA, PFOA precursors and related higher homologues of acids and precursors from fluorotelomer products; and
- Conducting studies on fluorotelomer products themselves to assess the potential for breakdown to PFOA and higher homologues.

With these actions, DuPont will severely restrict potential routes of exposure from its facilities, processes, and products. Accordingly, we intend to achieve the goals specified in the U.S. Environmental Protection Agency (EPA) 2010/15 PFOA Stewardship Program. We believe the steps we are taking will transform processes and products associated with PFOA so that future contributions to the environment will be dramatically reduced. These voluntary actions are the result of extensive improvements made in products and processes consistent with DuPont's "Biopersistent Materials Leadership Principles" and DuPont's history of reducing emissions and developing and introducing environmentally preferred technologies.

Background on PFOA, Fluoropolymers and Fluorotelomers

PFOA is an essential processing aid used by a number of domestic and foreign manufacturers to produce fluoropolymers. Fluoropolymers have useful and unique properties such as resistance to chemical or environmental attack, high temperature capabilities, non-stick characteristics, and electrical properties. Fluoropolymers are used in architectural fabrics; automotive fuel systems; telecommunications and electronic wiring insulation; and computer chip processing equipment and systems – in addition to consumer products such as cookware and apparel.

PFOA is largely removed in the manufacturing and conversion processes for virtually all industrial fluoropolymer applications. Testing has shown that some industrial products may contain trace levels of PFOA. Our research has found no detectable levels of PFOA in cookware products made with DuPont non-stick coatings, including those sold under the Teflon® brand.

PFOA is found in trace amounts in some fluorotelomer products as an unintended byproduct of the manufacturing process. Fluorotelomer products are not made with PFOA, nor is PFOA added during the manufacture of fluorotelomer-based products. Fluorotelomers are used to produce surface protection products, including surfactants and oil, stain and water repellents, for a wide range of applications including textiles, paper, fire fighting foam, medical barrier fabrics and hard surface coatings.

Products made with fluoropolymers and fluorotelomers are used in many critically important applications. Because of their unique characteristics they are widely used where dependable performance is essential. Critical industrial uses for fluoropolymers include insulation for wire and cabling, low emissions fuel hoses, pollution filters, high purity handling systems for integrated chip manufacture, and valves, tubing, liners and gaskets for severe service applications. Products made with fluorotelomers protect medical care providers against blood-borne pathogens and provide superior performance in extinguishing hydrocarbon fires, and can contribute significant environmental benefits by extending the life of and providing easier maintenance of many consumer products.

These products bring consumers many benefits, which include ease of care, reduced maintenance, and extended life for a broad range of articles used every day. In addition, coated cookware facilitates healthy cooking while providing a surface that is easily cleaned.

Potential Risks and EPA's Process to Understand Those Risks

Based on existing scientific data, including toxicity data and employee health studies conducted both by DuPont and other scientists, DuPont believes that PFOA exposure does not pose any health risk to the general public. Nonetheless, PFOA has been detected at very low levels in the blood of the general population and DuPont recognizes that the presence of PFOA in people's blood raises questions that should be addressed. Thus, we have taken action to reduce the potential for human exposure to PFOA from our products and processes. In addition, we have conducted new health studies, expanded our monitoring data and performed extensive fate and exposure analyses.

In late 2002, EPA initiated a priority review of PFOA that led to a public process to develop new data on the issue and reduce scientific uncertainties surrounding pathways of human exposure and potential risks. That process, formally launched early in 2003, included drafting a preliminary risk assessment; soliciting letters of intent from fluoropolymer and fluorotelomer manufacturers to provide data on a range of topics involving processes, releases, production volumes and toxicity; and developing formal TSCA Section 4 Enforceable Consent Agreements (ECAs) and Memoranda of Understanding (MOUs). Fluoropolymer and fluorotelomer manufacturers also cooperated in developing voluntary research activities addressing potential toxicity and degradation of our products. Information developed under this process has been entered into the public docket.

In January 2005, EPA released a refined and updated draft risk assessment and soon thereafter established an independent panel of outside scientific experts to peer review the document. This PFOA Review Panel, also referred to as the Science Advisory Board (SAB), is charged with advising EPA whether the assumptions used in the draft are scientifically sound and can be effectively used by the Agency to determine potential risks and appropriate risk management actions. The work of the SAB is ongoing and has not yet reached conclusions. Throughout the risk assessment process, DuPont scientists have contributed numerous studies, analyses and comments for review.

DuPont has supported the EPA public process and has worked collaboratively to meet the needs of the Agency in gaining greater knowledge about PFOA and its impact on human health and the environment. In addition, DuPont will work individually and with others in industry to inform EPA's regulatory counterparts in the European Union, Canada, China and Japan about activities and new information surrounding PFOA.

Facility Emissions Caps

In conjunction with EPA's public process, and in part prompted by it, DuPont has undertaken a comprehensive internal R&D effort to better understand how PFOA reaches the environment and to develop measures to restrict the pathways to exposure. This involved a thorough evaluation of

DuPont manufacturing processes and facilities, as well as an exhaustive analysis of products and precursors.

The actions being described in this letter are a direct outgrowth of this exhaustive R&D effort conducted over many years. During this time, DuPont has transformed the way fluoropolymers and fluorotelomers are made with the objective to significantly reduce PFOA emissions. These improvements are already underway and are producing dramatic reductions. As a result, we project that by year end 2007 PFOA emissions from all DuPont manufacturing facilities around the world will be reduced by more than 98% from a 1999 baseline. We expect the number of pounds of worldwide PFOA emissions will drop from 142,600 lbs. in 1999 to about 2,400 lbs. in 2007. At our U.S. facilities, we expect PFOA emissions will decrease by more than 99% to about 1,200 lbs. in the same period. Further, we have already reduced worldwide emissions of potential PFOA (and higher homologues) precursors from fluorotelomer manufacturing by more than 84% and will achieve 97% reductions by year end 2007.

Our increased understanding of this material and the steps that can be taken to control PFOA emissions has advanced to a point where these reductions can be translated into hard caps on future emissions from current U.S. facilities.

PFOA Reduction - Fluorotelomers

The scientific advances that have been made also allow us to commit to a 95% reduction, before 2010, in product content of PFOA, PFOA precursors and related higher homologues of acids and precursors from fluorotelomer products. Because fluorotelomer products are sold in many different concentrations, the commitments are expressed in terms of parts per million or weight percent of these materials on a "contained as solids" basis that reflects content in the absence of water or other solvents. The baseline for these reductions is the year 2004 when fluorotelomer production was at its peak and reduction efforts began. In all cases, as part of our program, these products will meet the content reduction commitments.

In order to achieve global reductions, DuPont believes such a stewardship program should be extended to consumers of fluorotelomer intermediates. The actions described above will result in content reductions in a number of our intermediates. Products derived from these intermediates should show a similar reduction in PFOA and precursor content. In those cases where it is not technically feasible to modify the intermediates, we will encourage our customers to pursue a program that will result in emission and product content reductions similar to DuPont.

Consistent with EPA's second goal, DuPont also commits to continuous improvement of our fluorotelomer manufacturing processes and products beyond the aggressive goals we have shared with you. New products are constantly being developed to reduce our environmental "footprint", yet still maintain high levels of effectiveness and performance. Success in this effort will depend on timely review and approvals for these new products. DuPont pledges to work with the EPA to provide necessary documentation and analysis in the application process for new fluorotelomer products. In the coming decade, DuPont hopes to commercialize breakthrough products that completely redefine fluorine chemistry applications in order to achieve environmentally sustainable growth of this important product line.

PFOA Reduction - Fluoropolymers

Fluoropolymers are different from fluorotelomers and have different applications and characteristics. DuPont's commitment for fluoropolymer products is equally aggressive. Fluoropolymer materials are sold as dry resin pellets or powder and in a water-diluted (aqueous dispersion) form to industrial fabricators. The dry product forms contain PFOA in small amounts, much of which is destroyed in fabrication. Aqueous dispersions contain higher amounts of residual PFOA (ca. 0.2% or 2000 ppm) some of which can be emitted from processor plant facilities. DuPont is committing to reduce PFOA content in fluoropolymer dispersions by more than 97% to greatly reduce the potential for these downstream emissions. Moreover, DuPont commits not to sell dispersion products with more than 50 ppm PFOA content by year end 2007.

DuPont has offered this dispersion treatment technology to our competitors in a royalty-free exchange. The U.S. fluoropolymer manufacturers, known as the Fluoropolymers Manufacturing Group, have committed to a 90% reduction of PFOA in their worldwide dispersion products by 2007. DuPont is offering its technology to help ensure the success of this industry commitment.

DuPont also is offering royalty-free access to its patents and technology for PFOA emissions abatement, water treatment and recovery for reuse.

DuPont will simultaneously conduct a comprehensive fluoropolymer product stewardship program for cookware manufacture to ensure that downstream applicators follow environmentally rigorous controls in their manufacturing practices.

Biodegradation

The EPA has raised questions about whether the potential biodegradation of fluorotelomer products is a pathway for PFOA exposure. The objective of our program is to severely restrict exposure from PFOA, including that from any potential biodegradation. DuPont is committed to conduct studies on fluorotelomer products to better understand the potential for exposure and determine the fate of existing products that might biodegrade. DuPont is also committed to develop and introduce technology and products which do not measurably contribute to PFOA in human blood.

Transparency

As part of our overall commitment we concur with EPA's objective for transparency of progress toward the goals. We commit to develop, share and ultimately publish analytical methods and measurements that provide transparency about our results versus our commitments. We will provide periodic reports on progress toward our commitments and will follow with ongoing reporting once our objectives have been achieved. This will allow both EPA and the public to evaluate the progress being made. We are happy to work with EPA to develop mechanisms to ensure transparency to the public as we work toward achieving our objectives.

Conclusion

As underscored by these commitments, you can count on our continued cooperation with EPA as it seeks to remove scientific uncertainties surrounding PFOA and develop appropriate risk assessment and risk management approaches for biopersistent materials in our environment. We hope that our emissions reduction program has been helpful in the development of the EPA 2010/2015 PFOA Stewardship Program. We encourage industry to fully participate in your program in order to achieve similar emission reduction results worldwide.

Respectfully submitted,

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Vice President

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