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

**Re: DuPont progress towards meeting the Environmental Protection Agency (EPA)
2010/15 PFOA Stewardship Program**

Dear Mr. Administrator,

This letter is in response to your request for the first annual report on industry participation in the global 2010/15 PFOA Stewardship Program, the voluntary emissions reduction program for perfluorooctanoic acid (PFOA) that you announced in January. As demonstrated by the actions outlined in this report, DuPont remains committed to the program goals and has already achieved significant reductions. Building upon research initiated years ago, DuPont has developed technologies that substantially limit PFOA content in our products and emissions from our manufacturing facilities. In fact, DuPont is pleased to report that we will exceed the 2010 objective of a 95 percent reduction in domestic manufacturing facility emissions by the end of this year.

In light of the growing body of knowledge that has emerged over the past few years about PFOA sources and pathways of exposure, it has become clear that use of DuPont products manufactured from processes that use PFOA are not a significant source of exposure. Emissions from the manufacturing and use of PFOA and POSF derivatives over 50 years appear to be a significant source of background levels of PFOA in the environment and these emissions are being dramatically reduced. It logically follows that as these emissions drop, so too will levels found in the blood of the general population, and, in fact, some data suggest that this may already be occurring. Based on our experience to date, which has been informed by extensive ongoing scientific research conducted by DuPont and other independent organizations, we are convinced the Stewardship Program offers the most effective and efficient near-term approach to further reducing exposure to this chemical.

PFOA has been detected in the environment and in the blood of the general population at very low levels. DuPont recognizes that the presence of PFOA in people's blood and the environment raises questions that should be addressed. Thus, we have taken action to reduce the potential for exposure to PFOA from our products and processes. DuPont continues to support EPA's efforts to gain greater knowledge about PFOA and its potential impact on human health and the environment and pledges continued cooperation with EPA as it undertakes appropriate methods for addressing biopersistent materials in our environment.

DuPont Achievements

In this report, we detail the progress we have made, not only in meeting the goals and objectives of the 2010/15 PFOA Stewardship Program, but also in transforming the way our products are made with the objective of significantly reducing emissions and expanding the base of scientific knowledge surrounding this chemical and its potential health effects. Our report includes baseline year information, as well as general progress made in emissions and product content reductions.

The DuPont achievements include:

- Reduced PFOA emissions in the global manufacture of fluoropolymers and fluorotelomers by more than 95 percent since 2000. The U.S. reduction is 97 percent;
- Reduced PFOA in converted fluoropolymer dispersion product content by 97 percent;
- Reduced PFOA and direct precursors in fluorotelomer product content by 97 percent in the U.S. by year end;
- Reduced worldwide PFOA emissions from manufacturing facilities from more than 150,000 lbs. in 2000 to less than 7,000 lbs. in 2006.
- Reduced PFOA emissions from U.S. manufacturing facilities from more than 108,000 lbs. to less than 3,000 lbs. in the same period.
- Developed DuPont patents and technology for PFOA emissions abatement, water treatment and recovery for reuse.
- Shared royalty-free access to DuPont patents and technology for PFOA emissions abatement, water treatment and recovery for reuse.
- Contributed to scientific knowledge base: more than 60 published scientific articles.

The actions described in this report are the result of an intensive R&D effort initiated prior to the EPA voluntary program as part of an internal PFOA reduction program at DuPont. Since the inception of this program, DuPont has transformed the way fluoropolymers and fluorotelomers are made by meeting the objective to significantly reduce PFOA use. Accordingly, DuPont is severely restricting potential routes of exposure from its facilities, processes, and products.

Moreover, our improved understanding of this material and the technologies that have been developed to control PFOA emissions has allowed us to produce more environmentally sustainable products without sacrificing performance.

PFOA Reduction - Fluoropolymers

DuPont has devoted substantial resources to reduce fluoropolymer manufacturing PFOA emissions since the late 1990's. We have developed new science and adapted existing technology to our processes capable of achieving 99 percent-plus removal efficiency in specific air and wastewater streams.

Since 1998 DuPont has installed 20 capital projects at our three main fluoropolymer production sites in the U.S., Europe, and Japan. These projects have also reduced emissions in a way that allows us to recover and recycle a substantial portion of the PFOA used.

Compared to 2000, these projects have reduced worldwide fluoropolymer manufacturing facility PFOA emissions to air and water by 90 percent through the end of 2005, with a 95 percent reduction projected in 2006. Two more major projects will be completed in 2007 that are projected to further reduce emissions to the 97 percent level.

DuPont will apply these reductions globally, as witnessed by the latest versions of this technology being installed in our new fluoropolymer manufacturing facility in Changshu, China. We have also shared royalty-free access to DuPont patents and technology for PFOA emissions abatement, water treatment and recovery for reuse.

DuPont also installed state-of-the-art emission abatement technology in our APFO (the ammonium salt of PFOA used as a polymerization aid in fluoropolymer production) manufacturing facility which limits emissions to less than 50 pounds per year; a reduction of more than 99 percent compared to the previous U.S. manufacturers' facility.

PFOA is largely removed in the manufacturing and conversion processes for virtually all industrial fluoropolymer applications. Testing has shown that while 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.

DuPont is reducing PFOA content in aqueous fluoropolymer dispersions (AFD) by implementing the Dispersion Reformulation Project (DRP). DRP has been underway since mid-2004 and has involved significant effort and costs within DuPont and by our customers.

PFOA itself is considered the “representative compound” to track in AFD, as the pure ammonium salt is and has been historically used for production. The baseline year for calculating the percent reduction is 2003 (necessary data from year 2000 was not sufficiently available). During that year, weighted average PFOA content for worldwide DuPont AFD was 1000 parts per million (ppm) on wet-weight basis, 970 ppm from U.S. operations and 1040 ppm from non-U.S. facilities. This corresponds to an overall dry-weight basis of about 2000 ppm.

In the past two years, we have developed and scaled up the DRP technology, constructed and started up commercial facilities at all three of our existing sites (now under construction at a fourth site in China), and have reduced PFOA content by at least 97 percent in converted products. As of September 2006, DuPont has converted approximately 50 percent of the product line by volume to low-PFOA products, and we are on track to convert over 90 percent of our volume to low-PFOA AFD by the end of 2006, consistent with the Fluoropolymers Manufacturers Group commitment made to EPA in February 2005. Again, these converted products have better than 97 percent reduction of PFOA versus baseline.

In the past year, through collaboration with customers and the supply chain, three application areas (automotive, military and medical) have been selectively identified that, due to their criticality, will require extended qualification times for complete conversion to new low-PFOA products. Thus, manufacturing and supply of old products will be necessary beyond 2007 in these applications. AFDs going into these applications will constitute less than 10 percent of our product volume in 2007, and this percentage will be reduced further as the new products are systematically qualified. Even with these exceptions we expect to achieve 95 percent overall product content reduction in 2008; two years ahead of the EPA’s requested 2010 Stewardship Program goal timing, and 97 percent overall reduction by 2010.

PFOA, Higher Homologue and Precursor Reduction - Fluorotelomers

While DuPont fluorotelomer processes and products have never been a major source, DuPont has actively worked to minimize emissions of PFOA, PFOA precursors and related higher homologues.

Fluorotelomer products are not made with PFOA, nor is PFOA added during the manufacture of fluorotelomer-based products. PFOA is found in trace amounts in some fluorotelomer products as an unintended manufacturing byproduct. Scientific studies have confirmed that fluorotelomer manufacturing emissions have not been a significant source of PFOA in the environment.

DuPont has sponsored and published independent, peer-reviewed studies showing that, even under the most conservative of assumptions, consumer articles manufactured with DuPont fluorotelomer products do not represent a quantifiable source of consumer exposure to PFOA.

Nevertheless, DuPont has diligently worked to reduce trace quantities of PFOA, PFOA precursors and related higher homologues from our fluorotelomer products. We have invested \$20 million in a new facility to destroy trace levels of these compounds in our fluorotelomer products. This, plus implementation of other planned improvements, is expected to reduce PFOA and direct precursor content in DuPont fluorotelomer products globally by more than 95 percent by year end 2007.

DuPont is extending our stewardship program to consumers of fluorotelomer intermediates. Products derived from intermediates manufactured under new processes should show a similar reduction in PFOA and direct precursor content and where it is not technically feasible to modify the intermediates, we have encouraged our customers to pursue a program that will result in emission and product content reductions.

Consistent with EPA's 2015 goal, DuPont has undertaken an aggressive product development effort to reduce our environmental "footprint" by engineering advanced substitutes, while still maintaining high levels of effectiveness and performance. Success in this area will depend on timely EPA review and approvals for these new products.

DuPont's Scientific Contribution

In our January 25, 2006 letter to the Administrator, DuPont indicated that it would work collaboratively to meet the needs of the Agency in gaining greater knowledge about PFOA and its impact on human health and the environment. The efforts have been extensive and comprehensive and have covered topics such as toxicology, atmospheric chemistry and methods, environmental modeling, fate, biodegradation, and risk assessment. More than 60 peer-reviewed studies have been published over the past few years.

Our science and research strategy has been designed to address a number of questions, including: Where are PFOA, related higher homologues and polyfluorinated materials found in the environment? What are the potential sources and routes of transport? What can be done to reduce exposure and measure progress? What is the impact (if any) of trace levels of PFOA in finished articles? Attached for your reference is a compilation of the studies that address these questions.

Going forward, our scientific efforts will be focused on new product development, longitudinal blood studies and selected health studies. We will continue to partner with the global science community on environmental biomonitoring. Further, we will work 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.

Health and Safety

DuPont has put our science to work, not only to learn more about PFOA, but most importantly to ensure our workers are safe, the public is safe, our products are safe and the environment is well protected. DuPont products made with or containing trace amounts of PFOA are safe for consumers. To date, there are no human health effects known to be caused by PFOA. Recent results of an extensive study of the health of more than 6,000 current and former workers at our plant in West Virginia – workers who generally have higher levels of PFOA in their blood than the general population -- support this conclusion. Based on published, peer-reviewed health and toxicological studies conducted by DuPont and other researchers, DuPont believes the weight of evidence indicates that PFOA exposure does not pose a health risk to the general public.

As demonstrated in this report, we have taken aggressive action to reduce exposure to PFOA from our products and processes and, in addition, we have conducted new health studies, expanded our monitoring data and performed extensive fate and exposure analyses. DuPont has also proactively analyzed consumer articles for PFOA content, estimated potential theoretical exposure and conducted risk characterizations to assure the safety of consumer articles. These studies were conducted by a third party and peer-reviewed by an independent scientific panel. The results reaffirmed DuPont's position that DuPont products are safe for their intended uses, and the use of these products would not result in quantifiable exposure to consumers.

Transparency and Global Participation

We continue to believe that essential elements of a successful stewardship program are transparency of effort and results, as well as global participation. DuPont is committed to applying the stewardship program to all of our facilities worldwide. While actual numbers are difficult to obtain for competitive reasons, more than half of the world's PFOA is made and used by other companies outside of the U.S. with manufacturing facilities in Japan, Europe and China. We look to EPA to work with your counterparts in other countries to ensure all manufacturers work to reduce emissions.

In the wake of the industry submissions, we look forward to working with the Agency to ensure that the reported results by participants are both comparable and reliable, and to help establish scientifically credible analytical standards and laboratory methods for measuring the chemicals in the program by the goal attainment year 2010. This will allow both EPA and the public to evaluate the progress being made.

DuPont Commitment

In summary, the DuPont commitment as part of the EPA 2010/2015 PFOA Stewardship Program is the following:

- Reduce global PFOA emissions from manufacturing facilities by 97% by year-end 2007
- Reduce global emissions of PFOA and direct precursors from fluorotelomer manufacturing by 95% by year-end 2010.
- Reduce PFOA content in fluoropolymer dispersions by 90% in 2007, 95% in 2008, and 97% by 2010
- Reduce product content of PFOA and direct precursors in DuPont fluorotelomer products globally by 96% by year-end 2007 and reduce indirect precursors by 95% by year-end 2010
- Conduct studies on fluorotelomer products themselves to assess the potential for breakdown to PFOA and higher homologues
- Work toward elimination of PFOA, PFOA precursors and related higher homologue chemicals from manufacturing facilities' emissions and products by 2015

Summary

The improvements that are already underway are producing dramatic PFOA reductions and you can count on DuPont's continued commitment on this issue. DuPont science is succeeding at improving our manufacturing processes and products beyond even the aggressive goals we have shared with you. As we work toward the elimination of PFOA, PFOA precursors and related higher homologues by 2015, our goal is to commercialize breakthrough products that completely redefine fluorine chemistry applications and achieve environmentally sustainable growth of this important product line. We look forward to working with EPA and the rest of the fluorotelomer and fluoropolymer industry as we pursue these important objectives.

Respectfully submitted,



Susan M. Stalnecker
Vice President & Treasurer

cc: Gulliford
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