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VIA OVERNIGHT DELIVERY

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

Attention: Docket ID Number EPA-HQ-OPPT-2006-0621

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

Dear Mr. Administrator,

This letter is in response to the Agency's request for information on industry progress toward meeting the emission reductions embodied in the 2010/15 PFOA Stewardship Program. This expands upon last year's report providing baseline data on facility emissions and product content. DuPont remains strongly committed to the program goals as demonstrated by the significant reductions we have already achieved. Through our ongoing research, DuPont has developed technologies that substantially limit perfluorooctanoic acid (PFOA) content in our products and emissions from our manufacturing facilities. In fact, DuPont is pleased to report that in 2006, we exceeded the 2010 objective of a 95 percent reduction in domestic manufacturing facility emissions. More broadly, we also achieved an approximate 95 percent reduction in global manufacturing emissions. Our success to date and our commitment described below give us every indication that we will meet or exceed the 2010/15 program objectives.

Consistent with these goals, in February 2007, DuPont announced two major developments. First, we announced significant progress in developing new high-performance products with reduced PFOA content. In our fluorotelomer products business we commercialized a patented manufacturing process that removes greater than 97 percent of trace levels of PFOA, direct precursors and homologues, ahead of the EPA program schedule. In our fluoropolymer products business we commercialized new technology that delivers at least a 97 percent reduction in PFOA content in aqueous fluoropolymer dispersions.

Second, DuPont committed to no longer make, use or buy PFOA by 2015. We are encouraged by our progress to eliminate PFOA and look forward to introducing more environmentally sustainable products in the future.

DuPont Achievements

In our submission, we detail the progress we have made through 2006 in meeting the goals and objectives of the 2010/15 PFOA Stewardship Program. The DuPont achievements include the following:

- Reduced total PFOA emissions by approximately 95 percent in our global manufacturing operations since 2000. The U.S. reduction is almost 98 percent.
- Qualified customers representing over 90 percent of our sales volume for aqueous fluoropolymer dispersions (AFD) to a newly formulated technology that reduces PFOA content by 97 percent.
- Commercialized a \$22 million facility that removes more than 97 percent of trace levels of PFOA, direct precursors and homologues in our fluorotelomer products.
- Developed 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 the PFOA scientific knowledge base with more than 70 published articles.

PFOA Reduction - Fluoropolymers

DuPont has devoted substantial resources to reduce PFOA emissions from our fluoropolymer manufacturing operations since the late 1990's. Since 1998 DuPont has installed 21 emissions reduction 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, we have reduced our worldwide fluoropolymer manufacturing facility PFOA emissions by 95 percent through the end of 2006. DuPont has applied these reduction technologies globally, as demonstrated in our new fluoropolymer manufacturing facility started up this year in China.

DuPont has significantly reduced PFOA content in aqueous fluoropolymer dispersions through the development of Echelon™ Technology. The successful conversion of our global AFD product line was initiated in mid-2004 and involved significant effort and cost by both DuPont and our customers. We have installed commercial facilities at all three of our existing fluoropolymer manufacturing sites, as well as at our new plant in China. Echelon™ Technology delivers reduced PFOA content of at least 97 percent, and by the end of 2006, DuPont qualified customers representing over 90 percent of our AFD sales volume to low-PFOA products. The reported figures reflect that 2006 was a transition year with a mix of both existing and reformulated, low-PFOA AFD products.

Three critical applications (military, medical, and automotive) will require extended qualification times for complete conversion to new low-PFOA products. AFDs going into these applications constitute less than 10 percent of our sales volume in 2007, and this percentage will be reduced further as these applications are converted.

PFOA, Higher Homologue and Precursor Reduction - Fluorotelomers

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. Although scientific studies indicate that fluorotelomer manufacturing emissions have not been a significant source of PFOA in the environment, DuPont has actively worked to minimize manufacturing emissions and product content of PFOA, PFOA precursors and related homologues.

In recent years we dedicated significant resources to develop new impurity reduction technologies. These new, patented technologies were demonstrated in pilot facilities in 2005, and commercialized in late 2006. We invested \$22 million in this new LX Platform Products technology that removes greater than 97 percent of PFOA, its homologues and direct precursors in our primary fluorotelomer intermediate and resultant products. This investment in new process technology clearly demonstrates DuPont is committed to minimizing our environmental footprint through scientific innovation and product improvement.

Global Participation

We are encouraged that eight companies have signed on to the voluntary stewardship program. However, some of the world's PFOA is made and used by companies not committed to a stewardship program. In order for such programs to be truly effective, we believe all such companies must adopt and implement aggressive reduction practices and processes. We support EPA's leadership in working with its counterparts in other countries to ensure that all such companies reduce emissions and product content of PFOA.

Conclusion

DuPont is proud of the PFOA reductions we have achieved and is committed to develop new high-performance, environmentally sustainable products. DuPont science is transforming our manufacturing processes and products, allowing us to go beyond the stewardship program by committing to no longer make, use or buy PFOA by 2015. We are pleased with our progress to date, and where possible, we will convert our products and processes in advance of 2015. Success in this area will depend on timely EPA review and approvals for these new products. We look forward to working with EPA and others in industry as we pursue these important objectives.

Respectfully submitted,

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