March 31, 2003

**Regular Mail**

The Honorable Stephen L. Johnson
Assistant Administrator
United States Environmental Protection Agency
Office of Prevention, Pesticides and Toxic Substances
1200 Pennsylvania Avenue N.W. (Room 7101M)
Washington, DC 20460

Dear Mr. Johnson:

This letter reaffirms the commitment of the companies identified below to assist the Environmental Protection Agency (EPA) in its investigation of perfluorooctanoic acid (PFOA) and ammonium perfluorooctanoate (APFO).[1]

1) APFO Users: Asahi Glass Fluoropolymers USA, Inc., Daikin America, Inc., Dyneon, LLC, and E.I. du Pont de Nemours and Company. These companies use APFO as a polymerization aid to manufacture fluoropolymers and fluoroelastomers. DuPont also manufactures APFO in the United States for use in fluoropolymer manufacturing.

2) Telomer Companies: AGA Chemicals, Inc., Clariant GmbH, Daikin America, Inc., and E.I. du Pont de Nemours and Company. These companies produce or import fluorotelomer-based products, which are used as fluorosurfactants and surface protection chemicals.

3) The 3M Company, the former U.S. manufacturer of APFO.

All signatories share and support the goals of safeguarding human health and the environment. By means of this letter and separate Letters of Intent, the signatories affirm their commitment to work on a comprehensive program to develop additional data on potential health or environmental effects of PFOA, to better characterize exposure pathways, to reduce or prevent such exposure, and to examine and, as necessary, strengthen product stewardship and risk communication practices.

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[1] While the APFO Users utilize APFO as a polymerization aid to manufacture certain fluoropolymers and fluoroelastomers, PFOA is the substance that has been found in some, but not all, the environmental and blood samples that have been tested. PFOA is also the chemical that has usually been tested in animal studies, because APFO dissociates in water into PFOA and ammonia. EPA has assigned Docket Number AR226 for all submissions on perfluorinated substances. AR226 also contains documents pertaining to other perfluorinated chemical substances. The APFO Users believe that the matters concerning APFO are different from those associated with the other chemical substances included in EPA Docket Number AR226.

The APFO Users are committed to reducing emissions of APFO from fluoropolymer manufacturing facilities. The APFO Users have committed to developing information to support a better understanding of exposure to APFO through conducting studies on finished resins and finished products, and on emissions and discharges from fluoropolymer processing facilities. They are also committed to further studies of the toxicology of APFO. Through the Society of the Plastics Industry (SPI), the APFO Users will submit information on work with EPA as this process moves forward. SPI is signing this agreement only to signify its willingness to act as a facilitator and conduit for information and communications between EPA and the fluoropolymer manufacturers and other members of the fluoropolymer industry, including fluoropolymer processors. Its participation is not an indication that SPI has any obligations addressed by separate agreements or Letters of Intent submitted by the APFO Users, the Telomer Companies, or 3M.

The Telomer Companies do not use PFOA or APFO in their manufacturing processes. These companies have committed to investigating whether and how telomer products can transform or break down into PFOA, and if so, to support a better understanding of those processes.

The 3M Company has 1) provided a summary of previous activity taken by the company including the phase-out of the production for sale of PFOA at the end of 2002, and 2) committed to a plan to continue a monitoring program for its former manufacturing sites.

The APFO Users, the Telomer Companies and 3M will each keep the EPA apprised of progress in conducting the research under their respective Letters of Intent. They will provide status reports to EPA and individually share the results from all studies, surveys or other investigations, as specified in the Letters of Intent.

The signatories of this letter appreciate the opportunity to work with EPA on this matter and agree that close coordination of our efforts and sharing of information is important. Accordingly, we will continue to communicate with EPA as information becomes available.

Respectfully Submitted,

APFO Users
Telomer Companies
The 3M Company

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