



October 31, 2008

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

RE: EPA 2010/15 PFOA Stewardship Program
Ciba Corporation (f/k/a "Ciba Specialty Chemicals Corporation")

Dear Administrator Johnson,

On behalf of Ciba Corporation, I am providing the enclosed status report of our 2007 PFOA emissions as part of our ongoing global commitment to the voluntary EPA 2010/15 PFOA Stewardship Program. Under the program, Ciba has agreed to reduce perfluorooctanoic acid (PFOA) emissions and product content by 95 percent, as measured from our baseline year, no later than 2010, and to work toward the complete elimination of PFOA from emissions and product content no later than 2015. Last year at this time, we submitted our annual status report for calendar year 2006, and committed to submit such annual status reports on our progress in October of each subsequent year.

I am pleased to report that in 2008 Ciba has already attained the critical milestone of reducing PFOA and "higher homologue" emissions and product content by more than 95%, as compared with our baseline year.

It is fundamental to point out that Ciba does not manufacture PFOA nor use it in our manufacturing processes. PFOA is an unwanted impurity that is mainly carried through from raw materials purchased from a third party. Through our measures to reduce production of products containing these raw materials and to improve our processing, in 2008 we have already attained a complete elimination of PFOA emissions from our U.S. facilities and are working to achieve the 2010 goal from our Non U.S. sources. Several factors are contributing to our progress, including the introduction of end-of-pipe technology at one of our Non-US production facilities, decreases in the PFOA content of our raw material, and product elimination via divestitures.

For 2007 we report the following figures for PFOA, PFOA precursors and higher homologues, as compared against our 2002 Baseline Year and subsequent 2006 results. These numbers reflect the combination of both the emissions of PFOA from our sites and impurities that might be contained in our products.

Source	Annual PFOA emissions & product content (lbs)	Annual precursor emissions & product content (lbs)	Annual higher homologue emissions & product content (lbs)
U.S. sources			
2002	66	<14	59
2006	0.1	0	0.1
2007	0	0	0

Source	Annual PFOA emissions & product content (lbs)	Annual precursor emissions & product content (lbs)	Annual higher homologue emissions & product content (lbs)
Non U.S. sources			
2002	1006	965	833
2006	65.4	2233	76
2007	36	1200	30

The precursor increase from Non-US sources is driven by increased sales of one of our relevant product families, as compared against 2002 sales. Ciba is actively developing and commercializing alternative products within this product family that are not fluorotelomer alcohol based. Following successful introduction, the quantity of precursor contained within the relevant product family is expected to gradually reduce.

At Ciba, we take our product stewardship obligations very seriously. We are encouraged by our progress in meeting our commitment to the 2010/15 PFOA Stewardship Program in the U.S. We will continue to work toward the 95% 2010 reduction goal of precursor emissions and product content, and toward the complete elimination of PFOA from our facilities and products by no later than 2015. Please feel free to contact me should have any questions concerning the enclosed report.

Sincerely,



Eric Marohn
 President
 Ciba Corporation, NAFTA Region

Copy by Overnight Mail to:

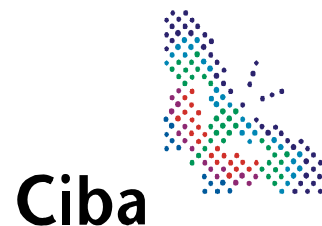
Charles M. Auer
 Director
 U.S. EPA Office of Pollution Prevention and Toxics
 1200 Pennsylvania Avenue, NW (7401M)
 Washington, DC 20460

Ciba Specialty Chemicals Corporation
USA

M. Alfred Wiedow, Ph.D., D.A.B.T.
Vice President
Toxicology and Regulatory Affairs
Water & Paper Treatment Segment

Telephone and Fax: (203) 798-0165

Internet: al.wiedow@cibasc.com



October 31, 2008

OPPT Document Control Office (DCO)
EPA East Building, Room 6428
1201 Constitution Avenue, NW
Washington, DC 20460-0001
Attn: Docket ID Number EPA-HQ-OPPT-2006-0621

Dear Sir/Madam:

In accordance with Agency policy and procedures at 40 CFR 2.201 *et seq.*, Ciba claims Appendix A of this report to be Confidential Business Information (CBI) in its entirety. Each page of Appendix A is CBI and is clearly marked with the term "Confidential."

Any questions concerning Ciba's CBI claims should be made immediately to:

M. Alfred Wiedow, Ph.D., D.A.B.T.
Ciba Corporation
Vice President of Toxicology and Regulatory Affairs
Water & Paper Treatment Segment

Very truly yours,

A handwritten signature in black ink that reads "M. Alfred Wiedow". The signature is written in a cursive, flowing style.