



Reply To:

KATHRYN K. MCCORD

E. I. du Pont de Nemours and Company

Vice President, Risk Management

1007 Market Street

Wilmington, DE 19898

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Email: Kathryn-Kamins.mccord@usa.dupont.com

October 31, 2008

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,

DuPont is pleased to submit our annual report measuring progress toward meeting the emission reductions embodied in the 2010/15 PFOA Stewardship Program. As we reported last year, DuPont continues to achieve significant reductions through ongoing research and new technologies that substantially limit perfluorooctanoic acid (PFOA) content in our products and emissions from our manufacturing facilities. This has allowed us to meet ahead of schedule EPA's 2010 objective of a 95 percent reduction in global manufacturing facility emissions. The results through 2007 are impressive: PFOA global manufacturing emissions from fluoropolymers and fluorotelomers were reduced by approximately 97 percent since 2000 with U.S. reductions exceeding 98 percent. These achievements underscore strong and continued commitment of DuPont to the program leaving us confident that we will meet or exceed the 2010/15 objectives.

PFOA Phase-out by 2015

As we reported last year, DuPont committed to no longer make, buy or use PFOA by 2015, or earlier if possible. Consistent with this commitment, DuPont undertook an aggressive product development effort to reduce our environmental footprint by engineering advanced substitutes. Already, a number of shorter carbon chain length substitutes used in manufacturing fluorotelomers have been reviewed and approved by the Agency, and more are being developed. In another product area, we have made significant technology advances in developing fluoropolymer products made without PFOA. Commercial scale quantities of some fluoropolymer products have been made without PFOA, and samples of some products have been made available to customers this

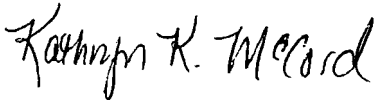
year for testing. These advances have allowed us not only to move toward our phase-out pledge, but also to serve customer needs by producing environmentally sustainable products without sacrificing performance.

Conclusion

The EPA PFOA Stewardship Program is already achieving impressive results. As stated on the EPA web site, a 2007 U.S. Center for Disease Control study "...reported significant reductions in human blood concentrations of PFOS and PFOA from 1999-2000 compared to the most recent data in 2003-2004. The geometric mean for PFOA in human blood was reduced by 25 percent over this period, and PFOS was reduced by 32 percent. The report concluded that these reductions were most likely related to changes brought about by EPA efforts on these chemicals and other related efforts by government and industry."

DuPont is proud of our accomplishments under the EPA PFOA Stewardship Program and remains committed to further reductions and phase-out in the future. We look forward to working with EPA and others in industry that share our goals as we pursue these important objectives.

Respectfully submitted,



Kathryn K. McCord

Cc: James B. Gulliford
James J. Jones
Charles M. Auer



Reply To:

KATHRYN K. MCCORD
E. I. du Pont de Nemours and Company
Vice President, Risk Management
1007 Market Street
Wilmington, DE 19898
Telephone: 302.999.5303
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Email: Kathryn-Kamins.mccord@usa.dupont.com

October 31, 2008

**PUBLIC COPY
NO CBI**

VIA OVERNIGHT DELIVERY

OPPT Document Control Office (DCO)
EPA East Building, Room 6428
1201 Constitution Avenue, NW
Washington, D.C. 20004
(202) 564-8930

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

Dear Sir/Madam:

2010/15 PFOA Stewardship Program Report

Please find enclosed, in both paper copy and on CD, the DuPont Year 2007 Report (public version) for the 2010/15 PFOA Stewardship Program. An index of documents is attached to this letter.

We look forward to further dialogue with respect to ongoing reporting to best meet the Program objectives.

Sincerely,

A handwritten signature in cursive script that reads "Kathryn K. McCord".

Kathryn K. McCord

Attachment and Enclosure (paper and CD)

Index of Documents – Public Version

Document Number On CD	Document Date	Document	Number of Pages
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2010/15 PFOA STEWARDSHIP PROGRAM

October 31, 2008

DuPont Submission

Document 002

Claimed as Confidential Business Information

2010/15 PFOA STEWARDSHIP PROGRAM
October 31, 2008
DuPont Submission

Document 003

Claimed as Confidential Business Information

2010/15 PFOA STEWARDSHIP PROGRAM
October 31, 2008
DuPont Submission

Document 004

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2010/15 PFOA STEWARDSHIP PROGRAM
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Document 005

Claimed as Confidential Business Information

2010/15 PFOA STEWARDSHIP PROGRAM
October 31, 2008
DuPont Submission

Document 006

Claimed as Confidential Business Information

Appendix D
Facility Report on Product Content
Aqueous Fluoropolymer Dispersion

COMPANY SANITIZED PUBLIC COPY

2010/15 PFOA Stewardship Program
Facility Report on Product Content
Public Copy

I. CHEMICAL IDENTIFICATION

Identify the product (e.g., fluoropolymer dispersion) for which you are submitting information:

Product name: Aqueous Fluoropolymer Dispersion

Product description (including concentrations of perfluoroalkyl chemicals identified in Section IV below and year of production):

Aqueous fluoropolymer dispersions of PTFE and melt copolymers
[CBI]

II. COMPANY IDENTIFICATION

Identify the company and location of the facility submitting information:

Company name: E. I. du Pont de Nemours and Company

Site location: [CBI]

Identify a company technical contact who can respond to inquiries about the information submitted:

Technical contact: William P. Raiford
Phone: 302-999-2684
Address: DuPont Fluoroproducts
CRP 702-2114
P.O. Box 80702
Wilmington DE, 19880-0702

III. PRODUCTION

Calendar year for which you are reporting: Jan 1, 2007 to Dec 31, 2007

Provide the amount of the product for the reporting year at each specific site:

Imported kgs/yr
Manufactured [CBI] kgs/yr

IV. PRODUCT CONTENT

A. CONCENTRATIONS OF RELEVANT PERFLUOROALKYL CHEMICALS

Please provide the concentrations (ppb) of various perfluoroalkyl chemicals in your product. For chemicals for which you do not have actual data, please provide range estimates.

The following is a nonexhaustive list of chemicals that should be included:

PFOA and its salts

- Octanoic acid, pentadecafluoro- (CAS 335-67-1)
- Octanoic acid, pentadecafluoro- ammonium salt (CAS 3825-26-1)

PFOA precursors

- Octane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7, 8,8-heptadecafluoro-8-iodo- (CAS 507-63-1)
- 1-Decanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluoro- (CAS 678-39-7)
- 1-Decene, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluoro- (CAS 21652-58-4)
- 2-Propenoic acid, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluorodecyl ester (CAS 27905-45-9)
- 2-Propenoic acid, 2-methyl-, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluorodecyl ester (CAS 1996-88-9)
- 2-Decenoic acid, 3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-hexadecafluoro- (CAS 70887-84-2)
- Decanoic acid, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluoro- (CAS 27854-31-5)

Higher homologues

- Dodecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12-

Part IV (cont.)

- pentacosafuoro-12-iodo- (CAS 307-60-8)
- Decane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10-heneicosafuoro-10-iodo- (CAS 423-62-1)
- Nonanoic acid, heptadecafluoro- (CAS 375-95-1)
- Decanoic acid, nonadecafluoro- (CAS 335-76-2)
- 1-Decanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluoro- (CAS 678-39-7)
- Decane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8-heptadecafluoro-10-iodo- (CAS 2043-53-0)
- Dodecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10-heneicosafuoro-12-iodo- (CAS 2043-54-1)
- 2-Propenoic acid, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluorodecyl ester (CAS 4980-53-4)
- 2-Propenoic acid, 2-methyl-, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-heneicosafuorododecyl ester (CAS 17741-60-5)

B. ANALYTICAL METHODS

PFOA concentration is measured on all production by Gas Chromatograph/Electron Capture Detector (GC/ECD) at the US and European sites and by High Performance Liquid Chromatography (HPLC) method at our Japan site. The Limit of Detection (LOD) for the GC/ED method is 1 ppm. The LOD for the HPLC method is 3 ppm at this time.

SECTION 4: SUMMARY OF PRODUCT CONTENT Polymers – Public								
Reporting Period (use calendar year - e.g. Jan 1, 2005 to Dec 31, 2005)					January 1, 2007 – December 31, 2007			
4a	Product type		Fluoropolymer dispersions		Other fluoropolymers ⁱ		Telomer based products	
	Production volume (kgs/year) ⁱⁱ		[CBI]					
4b	Operations	Chemical category	Concentration ⁱⁱⁱ			% Reduction from baseline year		
			Fluoropolymer dispersions ^{iv} (ppm wet-weight)	Fluoropolymer dispersions ^v (ppm dry weight)	Telomer based products ^{vi} (ppb dry weight)	Fluoropolymer dispersions	Other fluoropolymers ¹	Telomer based products
	U.S. facilities	PFOA, PFOA salts and higher homologues	36	62		96%		
		Precursors						
4c	Non-U.S. facilities	PFOA, PFOA salts and higher homologues	120	227		88%		
		Precursors						
4d	Please provide information on the methods, assumptions, uncertainties and detection limits for the data provided above.							
	PFOA concentration is measured on all production by Gas Chromatograph/Electron Capture Detector (GC/ECD) at the US and European sites and by High Performance Liquid Chromatography (HPLC) method at our Japan site. The Limit of Detection (LOD) for the GC/ED method is 1 ppm. The LOD for the HPLC method is 3 ppm at this time.							

ⁱ Fluoropolymers manufactured with PFOA or PFNA.

ⁱⁱ Use the following ranges: (1) Zero (2) > 0 – 10 kgs; (3) > 10 kgs – 100 kgs; (4) > 100 kgs – 1,000 kgs; (5) > 1,000 kgs – 10,000 kgs; (6) > 10,000 kgs – 100,000 kgs; (7) > 100,000 kgs – 1,000,000 kgs; (8) Over 1,000,000 kgs.

ⁱⁱⁱ Concentration should reflect the concentration of chemical in the product as sold by the reporting company. If the reporting company has information concerning the concentration of chemical in the product as used by others – for example, as incorporated by dilution into a formulation – that additional information would also be helpful.

^{iv} This value should be expressed as a weighted average concentration and range.

^v This value should be expressed as a maximum concentration.

^{vi} This value should be expressed as a simple (not weighted) average and range.

Appendix D
Facility Report on Product Content
Fluoroelastomers

COMPANY SANITIZED PUBLIC COPY

2010/15 PFOA Stewardship Program
Facility Report on Product Content
Public Copy

I. CHEMICAL IDENTIFICATION

Identify the product (e.g., fluoropolymer dispersion) for which you are submitting information:

Product name: Fluoroelastomer

Product description (including concentrations of perfluoroalkyl chemicals identified in Section IV below and year of production):

Elastomer made from fluorinated monomers in aqueous dispersion with the ammonium salt of PFOA, i.e. Octanoic acid, pentadecafluoro-ammonium salt (CAS 3825-26-1)

II. COMPANY IDENTIFICATION

Identify the company and location of the facility submitting information:

Company name: DuPont Performance Elastomers LLC

Site location: [CBI]

Identify a company technical contact who can respond to inquiries about the information submitted:

Technical contact: Pascal Ferrandez

Phone: 240 994 4967

Address: Bellevue Parkway Corporate Center, Suite 300
300 Bellevue Parkway
Wilmington DE 19809

III. PRODUCTION

Calendar year for which you are reporting: Jan 1, 2007_ to Dec 31, 2007

Provide the amount of the product for the reporting year at each specific site:

Imported kgs/yr
Manufactured [CBI] kgs/yr

IV. PRODUCT CONTENT

A. CONCENTRATIONS OF RELEVANT PERFLUOROALKYL CHEMICALS

Please provide the concentrations (ppb) of various perfluoroalkyl chemicals in your product. For chemicals for which you do not have actual data, please provide range estimates.

The following is a nonexhaustive list of chemicals that should be included:

PFOA and its salts

- Octanoic acid, pentadecafluoro- (CAS 335-67-1)
- Octanoic acid, pentadecafluoro- ammonium salt (CAS 3825-26-1)

PFOA precursors

- Octane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7, 8,8-heptadecafluoro-8-iodo- (CAS 507-63-1)
- 1-Decanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluoro- (CAS 678-39-7)
- 1-Decene, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluoro- (CAS 21652-58-4)
- 2-Propenoic acid, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluorodecyl ester (CAS 27905-45-9)
- 2-Propenoic acid, 2-methyl-, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluorodecyl ester (CAS 1996-88-9)
- 2-Decenoic acid, 3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-hexadecafluoro- (CAS 70887-84-2)
- Decanoic acid, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluoro- (CAS 27854-31-5)

Higher homologues

- Dodecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12-pentacosafuoro-12-iodo- (CAS 307-60-8)
- Decane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10-heneicosafuoro-10-iodo- (CAS 423-62-1)
- Nonanoic acid, heptadecafluoro- (CAS 375-95-1)

Part IV (cont.)

- Decanoic acid, nonadecafluoro- (CAS 335-76-2)
- 1-Decanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluoro- (CAS 678-39-7)
- Decane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8-heptadecafluoro-10-iodo- (CAS 2043-53-0)
- Dodecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10-heneicosafuoro-12-iodo- (CAS 2043-54-1)
- 2-Propenoic acid, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluorodecyl ester (CAS 4980-53-4)
- 2-Propenoic acid, 2-methyl-, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-heneicosafuorododecyl ester (CAS 17741-60-5)

B. ANALYTICAL METHODS

The method of analysis consisted of a process of extraction using high purity methanol as the solvent, followed by LC-MS-MS analysis of the extract as described in the following article:

Larsen, B. S., Kaiser, M. A., Botelho, M., Wooler, G. R., Buxton, L. W. Comparison of Pressurized Solvent and Reflux Extraction methods for the determination of perfluorooctanoic acid in polytetrafluoroethylene polymers using LC-MS-MS. *Analyst*. 2005, **130**, 59-62.

SECTION 4: SUMMARY OF PRODUCT CONTENT Fluoroelastomers – Public								
Reporting Period (use calendar year - e.g. Jan 1, 2005 to Dec 31, 2005)				January 1, 2007 – December 31, 2007				
4a	Product type		Fluoropolymer dispersions		Other fluoropolymers ⁱ		Telomer based products	
	Production volume (kgs/year) ⁱⁱ							
4b	Operations	Chemical category	Concentration ⁱⁱⁱ			% Reduction from baseline year		
			Fluoropolymer dispersions ^{iv} (ppm wet-weight)	Other fluoropolymers ^{1,v} (ppb dry weight)	Telomer based products ^{vi} (ppb dry weight)	Fluoropolymer dispersions	Other fluoropolymers ¹	Telomer based products
	U.S. facilities	PFOA, PFOA salts and higher homologues		Fluoroelastomers 14,000 ppb (14 ppm)			96%	
		Precursors						
4c	Non-U.S. facilities	PFOA, PFOA salts and higher homologues		Fluoroelastomers 0 ppb			100%	
		Precursors						
4d	Please provide information on the methods, assumptions, uncertainties and detection limits for the data provided above.							
	<p>Fluoroelastomers content: analytical measurement GC/ECD (Gas Chromatography / Electron Capture Detection) with LOD 1 ppm on limited but representative sample of past production, as elimination of use of PFOA occurred in 2001 for the manufacturing of most fluoroelastomers. Current production analyzed with LC/MS/MS (Liquid Chromatography Mass Spectrometry Triple Quad) with LOD of 30 ppt after Pressurized Solvent Extraction Technique, as described in the following article:</p> <p>Larsen, B. S., Kaiser, M. A., Botelho, M., Wooler, G. R., Buxton, L. W. Comparison of Pressurized Solvent and Reflux Extraction methods for the determination of perfluorooctanoic acid in polytetrafluoroethylene polymers using LC-MS-MS. <i>Analyst</i>. 2005, 130, 59-62.</p>							

ⁱ Fluoropolymers manufactured with PFOA.

ⁱⁱ Use the following ranges: (1) Zero (2) > 0 – 10 kgs; (3) > 10 kgs – 100 kgs; (4) > 100 kgs – 1,000 kgs; (5) > 1,000 kgs – 10,000 kgs; (6) > 10,000 kgs – 100,000 kgs; (7) > 100,000 kgs – 1,000,000 kgs; (8) Over 1,000,000 kgs.

ⁱⁱⁱ Concentration should reflect the concentration of chemical in the product as sold by the reporting company. If the reporting company has information concerning the concentration of chemical in the product as used by others – for example, as incorporated by dilution into a formulation – that additional information would also be helpful.

^{iv} This value should be expressed as a weighted average concentration and range.

^v This value should be expressed as a maximum concentration.

^{vi} This value should be expressed as a simple (not weighted) average and range.

Appendix D
Facility Report on Product Content
Fluorotelomers

COMPANY SANITIZED PUBLIC COPY

2010/15 PFOA Stewardship Program
Facility Report on Product Content
Public Copy

I. CHEMICAL IDENTIFICATION

Identify the product (e.g., fluoropolymer dispersion) for which you are submitting information:

Product name: Fluorotelomer-based polymeric and surfactant products

Product description (including concentrations of perfluoroalkyl chemicals identified in Section IV below and year of production):

Production year: 2007

[CBI]

II. COMPANY IDENTIFICATION

Identify the company and location of the facility submitting information:

Company name: E. I. du Pont de Nemours and Company

Site locations: [CBI]

Identify a company technical contact who can respond to inquiries about the information submitted:

Technical contact: Stephen Korzeniowski
Phone: 302-695-8672
Address: DuPont Experimental Station
ESL 402-5231
Route 141 and Henry Clay
Wilmington, DE 19803

III. PRODUCTION

Calendar year for which you are reporting: Jan 1, 2007 to Dec 31, 2007

Provide the amount of the product for the reporting year at each specific site:

Imported	NA	kgs/yr
Manufactured	[CBI]	[CBI]

IV. PRODUCT CONTENT

A. CONCENTRATIONS OF RELEVANT PERFLUOROALKYL CHEMICALS

Please provide the concentrations (ppb) of various perfluoroalkyl chemicals in your product. For chemicals for which you do not have actual data, please provide range estimates.

The following is a nonexhaustive list of chemicals that should be included:

PFOA and its salts

- Octanoic acid, pentadecafluoro- (CAS 335-67-1)
- Octanoic acid, pentadecafluoro- ammonium salt (CAS 3825-26-1)

PFOA precursors

- Octane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7, 8,8-heptadecafluoro-8-iodo- (CAS 507-63-1)
- 1-Decanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluoro- (CAS 678-39-7)
- 1-Decene, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluoro- (CAS 21652-58-4)
- 2-Propenoic acid, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluorodecyl ester (CAS 27905-45-9)
- 2-Propenoic acid, 2-methyl-, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluorodecyl ester (CAS 1996-88-9)
- 2-Decenoic acid, 3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-hexadecafluoro- (CAS 70887-84-2)
- Decanoic acid, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluoro- (CAS 27854-31-5)

Higher homologues

- Dodecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12-pentacosafuoro-12-iodo- (CAS 307-60-8)
- Decane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10-heneicosafuoro-10-iodo- (CAS 423-62-1)
- Nonanoic acid, heptadecafluoro- (CAS 375-95-1)
- Decanoic acid, nonadecafluoro- (CAS 335-76-2)

- 1-Decanol, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluoro- (CAS 678-39-7)
- Decane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8-heptadecafluoro-10-iodo- (CAS 2043-53-0)
- Dodecane, 1,1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10-heneicosafuoro-12-iodo- (CAS 2043-54-1)
- 2-Propenoic acid, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,10-heptadecafluorodecyl ester (CAS 4980-53-4)
- 2-Propenoic acid, 2-methyl-, 3,3,4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,12,12,12-heneicosafuorododecyl ester (CAS 17741-60-5)

[CBI]

B. ANALYTICAL METHODS –

The general methods used for the analyses reported here have been published in the following article:

Larsen, B.S.; Stchur, P.; Szostek, B.; Bachmura, S.F.; Rowand, R.C.; Prickett, K.B.; Korzeniowski, S.H.; Buck, R.C. Method development for the determination of residual fluorotelomer raw materials and perfluorooctanoate in fluorotelomer-based products by gas chromatography and liquid chromatography mass spectrometry. *Journal of Chromatography A*. **2006** (1110), 117-124.

In general the LOQ was 2 ppm and LOD was 0.7 ppm.

Unpublished improvements have been made to the PFOA method providing for an LOQ of 0.5 ppm and an LOD of 0.15 ppm. This improved method was used in 2007.

SECTION 4: SUMMARY OF PRODUCT CONTENT Telomers - Public								
Reporting Period (use calendar year - e.g. Jan 1, 2005 to Dec 31, 2005)				as of December 31, 2007 (Year End Run Rate)				
4a	Product type		Fluoropolymer dispersions		Other fluoropolymers ⁱ		Telomer based products	
	Production volume (kgs/year) ⁱⁱ							
4b	Operations	Chemical category	Concentration ⁱⁱⁱ			% Reduction from baseline year		
			Fluoropolymer dispersions ^{iv} (ppm wet-weight)	Other fluoropolymers ^{1,v} (ppb dry weight)	Telomer based products ^{vi} (Year End run rate - kg.)	Fluoropolymer dispersions	Other fluoropolymers ¹	Telomer based products
	Global facilities	PFOA, PFOA salts			21			96%
		Direct Precursors C8 Telomer A 8-2-8 Ester			3 2 1			96%
4d	Please provide information on the methods, assumptions, uncertainties and detection limits for the data provided above.							
	<p>LOQs for analytical methods for impurities in DuPont FT products is 2 ppm. Methods used were as follows: LC/MS/MS - PFOA; GC/MS - all others. Values were obtained by measuring individual products, obtaining the impurity levels in ppm, and then calculating the actual pounds of impurities by multiplying the pounds made times the ppm of impurities. These are the values reported above. If a value was determined to be <LOQ, we used the standard EPA convention of 1/2 LOQ as the measurement for the yearly pounds calculation. The general methods used for the analyses reported here have been published in the following article:</p> <p>Larsen, B.S.; Stchur, P.; Szostek, B.; Bachmura, S.F.; Rowand, R.C.; Prickett, K.B.; Korzeniowski, S.H.; Buck, R.C. Method development for the determination of residual fluorotelomer raw materials and perfluorooctanoate in fluorotelomer-based products by gas chromatography and liquid chromatography mass spectrometry. Journal of Chromatography A. 2006 (1110), 117-124. In general the LOQ was 2 ppm and LOD was 0.7 ppm. Unpublished improvements have been made to the PFOA method providing for an LOQ of 0.5 ppm and an LOD of 0.15 ppm. This improved method was used in 2007.^{vii}</p>							

ⁱFluoropolymers manufactured with PFOA.

ⁱⁱ Use the following ranges: (1) Zero (2) > 0 – 10 kgs; (3) > 10 kgs – 100 kgs; (4) > 100 kgs – 1,000 kgs; (5) > 1,000 kgs – 10,000 kgs; (6) > 10,000 kgs – 100,000 kgs; (7) > 100,000 kgs – 1,000,000 kgs; (8) Over 1,000,000 kgs.

ⁱⁱⁱ Concentration should reflect the concentration of chemical in the product as sold by the reporting company. If the reporting company has information concerning the concentration of chemical in the product as used by others – for example, as incorporated by dilution into a formulation – that additional information would also be helpful.

^{iv} This value should be expressed as a weighted average concentration and range.

^v This value should be expressed as a maximum concentration.

^{vi} This value should be expressed as a simple (not weighted) average and range.

ATTACHMENT

CONFIDENTIAL BUSINESS INFORMATION

Appendix F
Company Annual Report – Summary of
Reductions in Emissions and Product Content

COMPANY SANITIZED PUBLIC COPY

SECTION 1: REPORT DATE	October 31, 2008
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SECTION 2: COMPANY IDENTIFICATION
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2a	Company Name E. I du Pont de Nemours and Company
	Street Address 1007 Market Street, Wilmington DE USA 19808

SECTION 3: SUMMARY OF EMISSIONS Public
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Reporting Period (use calendar year - e.g. Jan 1, 2005 to Dec 31, 2005)			January 1, 2007 – December 31, 2007			
3a	Operations	Chemical category	Releases to all environmental media from fluoropolymer and telomer manufacture			% Reduction of total kgs released from baseline year
			kgs	$\frac{\text{kgs of category}}{\text{kgs of fluoropolymers}}$	$\frac{\text{kgs of category}}{\text{kgs of telomers}}$	
U.S. facilities	PFOA and PFOA salts	960			98%	
	Higher homologues					
	Precursors	[CBI]			[CBI]	
3b Non-U.S. facilities	PFOA and PFOA salts	1410			93%	
	Higher homologues					
	Precursors					
3c	Please provide information on the methods, assumptions, uncertainties and detection limits for the data provided above.					
	Methods, assumptions, etc. provided in business/site specific forms					

Product Content information is not summarized – see the individual Business reports

SECTION 4: SUMMARY OF PRODUCT CONTENT								
Reporting Period (use calendar year - e.g. Jan 1, 2005 to Dec 31, 2005)					January 1, 2007 – December 31, 2007			
4a	Product type		Fluoropolymer dispersions	Other fluoropolymers ⁱ			Telomer based products	
	Production volume (kgs/year) ⁱⁱ							
4b	Operations	Chemical category	Concentration ⁱⁱⁱ			% Reduction from baseline year		
			Fluoropolymer dispersions ^{iv} (ppm wet-weight)	Other fluoropolymers ^{1,v} (ppb dry weight)	Telomer based products ^{vi} (ppb dry weight)	Fluoropolymer dispersions	Other fluoropolymers ¹	Telomer based products
	U.S. facilities	PFOA, PFOA salts and higher homologues						
		Precursors						
4c	Non-U.S. facilities	PFOA, PFOA salts and higher homologues						
		Precursors						
4d	Please provide information on the methods, assumptions, uncertainties and detection limits for the data provided above.							

ⁱ Fluoropolymers manufactured with PFOA.

ⁱⁱ Use the following ranges: (1) Zero (2) > 0 – 10 kgs; (3) > 10 kgs – 100 kgs; (4) > 100 kgs – 1,000 kgs; (5) > 1,000 kgs – 10,000 kgs; (6) > 10,000 kgs – 100,000 kgs; (7) > 100,000 kgs – 1,000,000 kgs; (8) Over 1,000,000 kgs.

ⁱⁱⁱ Concentration should reflect the concentration of chemical in the product as sold by the reporting company. If the reporting company has information concerning the concentration of chemical in the product as used by others – for example, as incorporated by dilution into a formulation – that additional information would also be helpful.

^{iv} This value should be expressed as a weighted average concentration and range.

^v This value should be expressed as a maximum concentration.

^{vi} This value should be expressed as a simple (not weighted) average and range.

2010/15 PFOA STEWARDSHIP PROGRAM
October 31, 2008
DuPont Submission

Document 011

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