



March 1, 2006

Honorable Stephen L. Johnson  
Administrator  
United States Environmental Protection Agency (EPA)  
1200 Pennsylvania Avenue, N. W. (1101A)  
Washington, D. C. 20460

Re: **PFOA Stewardship Program**

Dear Administrator Johnson:

3M Company (3M) and its subsidiary, Dyneon, LLC (Dyneon), have received your January 25, 2006 letter inviting our participation in EPA's "2010/15 PFOA Stewardship Program." 3M and Dyneon are pleased to commit to the goals of the Program. In many respects, this Program reflects the environmental, health and safety (EHS) measures that 3M and Dyneon have been engaged in on PFOA for a number of years.

Under the 2010/15 PFOA Stewardship Program, EPA has established two commitment goals: (1) to achieve, no later than 2010, a 95% reduction, as measured against a year 2000 baseline, in facility emissions and product content of PFOA and related precursor and higher homologue compounds and (2) to work towards the elimination of all such compounds from emissions and products within five years thereafter, or by no later than 2015. As described below, 3M and Dyneon already have made substantial progress towards -- and are committed to -- these two goals.

1. **Goal of 95 Percent Reduction by 2010**

As you know, 3M announced in May of 2000 its intention to phase out of the manufacture of perfluorooctanyl chemistry, which included PFOA. The production of PFOA has now ceased

As a direct result of this 3M production phase out and other improvements in manufacturing operations, 3M and Dyneon already have achieved a greater than 95 percent reduction in PFOA emissions in the U.S. and an 88 percent reduction worldwide as measured against a year 2000 baseline. By 2010, 3M and Dyneon will meet or exceed the Program's 95 percent facility emissions reduction target for PFOA, on a global basis.

Dyneon continues to use PFOA at its facility in Gendorf, Germany as a necessary fluoropolymer manufacturing aid. Dyneon has developed and is using a PFOA "capture for recycle" technology. This technology, which allows for PFOA recapture and reuse, has and will continue

to result in significant reductions in PFOA emissions at the Gendorf Germany fluoropolymer production site.

In a January 10, 2005 letter, Dyneon informed EPA of our plan to offer for commercial sale only "reduced APFO PTFE dispersions" by the end of the second quarter 2005. These reduced APFO dispersions are now being sold, and the original dispersion products are no longer offered for sale, in the U.S. or other regions. The APFO content of these dispersions was reduced from an average of about 1500 ppm to 20 ppm or less, or by about 98 percent. Dyneon expects to achieve the same 98 percent APFO content reduction in the rest of our commercial aqueous fluoropolymer dispersion-based products by the end of 2006, on a global basis.

Dyneon was able to achieve these reductions in dispersion APFO content by pioneering technology to remove, recover and reuse APFO from our dispersions as well as from our waste streams, as mentioned above. In addition, Dyneon has offered to license to other fluoropolymer producers both our technology to reduce the APFO content of fluoropolymer dispersions and our technology to recover and reuse APFO from waste streams. In fact, we have already licensed these technologies to some other fluoropolymer producers.

## 2. Goal of Elimination by 2015

3M and Dyneon already have made substantial progress towards eliminating global facility emissions of PFOA through the production phase out and the capture for recycle measures described above. In addition, both 3M and Dyneon have ongoing efforts to monitor, report and assess PFOA facility emissions. We plan to continue these efforts to provide useful information in gauging progress towards the 2015 facility emissions elimination goal.

Dyneon also is committed to working toward the elimination of PFOA from products. We look forward to providing EPA with further information on our research to that end under the reporting aspects of the 2010/15 PFOA Stewardship Program.

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EPA's January 25, 2006 letter also included an enclosure which described the considerable challenges in establishing scientifically credible and reproducible analytical standards and methods for measuring chemicals in the Stewardship Program and requested companies to work with EPA, other Program participants and others in meeting these challenges. As you know, 3M has been a leader in the advancement of analytical methods development and refinement for measurement of fluorochemicals in the environment. Our work has been shared with EPA and is in the published scientific literature. In March of 2003, 3M submitted a Letter of Intent to EPA that outlined a number of voluntary commitments, including our commitment to work with other members of industry to conduct additional validation of the PFOA serum analytical method and sampling protocol, to continue to publish our analytical methods in peer reviewed journals, and to continue to qualify independent laboratories to perform these methods. We view ensuring accurate and reproducible results in chemical analysis as essential to the success of the Stewardship Program and will continue our efforts in this area.

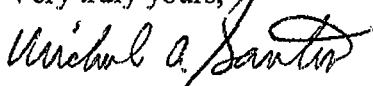
EPA's letter also notes the need for continued research "to better understand the sources, pathways of exposure and potential risks of these chemicals." Our ongoing commitments in this area are reflected in the Letter of Intent, in our site-related environmental assessment program at our Decatur, Alabama facility and in our ongoing human health and environmental research programs. In addition, 3M's decades long research in a number of these areas is well documented. Numerous studies are in the published scientific literature and have been provided to EPA.

Finally, we note that the "precursor chemicals that can break down to PFOA, and the related higher homologue chemicals" which are within the Stewardship Program's framework are not manufactured by 3M or Dyneon.

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This letter affirms the commitment of 3M and Dyneon to participate in the 2010/15 PFOA Stewardship Program. 3M and Dyneon would like to meet with EPA in the near future regarding the details of our participation, and I will contact your staff to arrange a meeting. In the meantime, please do not hesitate to contact me with any questions.

Very truly yours,



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cc: Charles M. Auer – US EPA