



Jay R. Reyher
Regional Group President, Technical Polymers
Global General Manager, Fluoropolymers

March 1, 2006

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

Re: Arkema Inc. Response to EPA 2010/2015 PFOA Stewardship Program

Dear Administrator Johnson:

Arkema Inc. is responding to your letter requesting industry participation in a voluntary stewardship program seeking reductions in emissions and product content levels of PFOA and related chemicals. As you are aware, for the past several years Arkema has dedicated serious and committed product stewardship efforts to the use of fluorosurfactants in its products. We are glad to see that EPA's stewardship program is consistent with Arkema's ongoing activities. Arkema is pleased to participate in EPA's Stewardship Program as further outlined in this letter.

Arkema does not manufacture or use PFOA. Arkema uses, but does not manufacture, a different fluorosurfactant composed primarily of ammonium perfluorononanoate (APFN) as a processing aid in the manufacture of some, but not all, of its high performance fluoropolymers sold for commercial and industrial uses.

Arkema's fluoropolymers (PVDF) are high molecular weight polymers with many unique properties, including exceptional weathering resistance, low flame and smoke characteristics, good resistance to most chemicals and solvents as well as to nuclear radiation, and high thermal stability. As a result, PVDF products are used in such critical industrial applications as chemical handling systems, electrical cable insulation and jacketing, architectural finishes and coatings, high purity piping, and high performance films.

Arkema Inc.
2000 Market Street
Philadelphia, PA 19103

Tel.: 215-419-7000
www.arkemagroup.com

In evaluating total global emissions of PFOA and related chemicals, it is important to place APFN's role in context. Globally, products produced with APFN represent less than ten percent of all products produced with PFOA or APFN. Arkema's PVDF products contain very low residual levels of APFN, ranging from 80-110 ppm. In comparison, other fluoropolymer products contain as much as 2000 ppm of fluorosurfactant.

Based upon existing scientific, toxicological, and epidemiological data, Arkema believes that APFN exposures from Arkema's products do not pose health risks to Arkema's employees or users of its products. Arkema has co-sponsored voluntary research activities addressing potential toxicity of APFN. A robust epidemiology study of Arkema employees exposed to APFN has concluded that there is no evidence to support an association between working in APFN exposed jobs and adverse health changes. Indeed, the EPA has acknowledged that it "is not aware of any studies specifically relating current levels of PFOA exposure to human health effects." Arkema recognizes, however, that PFOA has been detected at very low levels in the blood of the general population, and that this has raised issues for this class of compounds.

Acknowledging these issues, Arkema set a goal of developing viable replacements for APFN in the manufacture of its PVDF products. In 2002, Arkema began an intensive research and development effort to identify and evaluate alternative non-fluorinated processing aids that are on the TSCA Inventory. Arkema has spent millions of dollars and committed the time and resources of many scientists and engineers to this project. After several years of considerable effort, Arkema has achieved notable success.

As a result of this extensive commitment, Arkema has successfully eliminated the use of APFN in some products, and significantly reduced the amount of APFN used to produce other products. Further, Arkema's current business goal, which is consistent with EPA's Stewardship Program, is to eliminate the use of APFN in 95 percent of its PVDF products by 2010. With respect to those limited PVDF products where Arkema has not yet identified a replacement processing aid, Arkema will manage emissions at its manufacturing facilities until it commercializes APFN-free products. Much of Arkema's success to date has come from its close working relationships with its customers. As we go forward, we anticipate that this support will continue.

Arkema is proud of the accomplishments that it has already achieved in significantly reducing the amount of APFN used in the production of its PVDF products and looks forward to providing to the Agency periodic public reports on its progress towards meeting its goals.

Very truly yours,



Jay R. Reyher
Regional Group President,
Technical Polymers