3M Specialty Materials

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3M

BY HAND DELIVERY

OPPT Document Control Office (DCO)
U.S. Environmental Protection Agency
1201 Constitution Avenue, N.W. (East Building)
Washington, D.C. 20460
Attention: Docket ID Number EPA-HQ-OPPT-2006-0621

Re: 2007 Submission of 3M/Dyneon under the EPA 2010/2015 PFOA Stewardship Program

Dear Sir or Madam:

3M Company (3M) and its subsidiary, Dyneon, LLC (Dyneon), are pleased to make their 2006 submission under EPA's 2010/15 PFOA Stewardship Program [hereinafter "the Program"]. This submission has been prepared with reference to EPA's "Guidance on Reporting Emissions and Product Content October 2006" [hereinafter "the Guidance"], the "Reporting Guidance Clarifications for the 2010/15 PFOA Stewardship Program Progress Reports" issued in September 2007 and to our March 1, 2006 letter to Administrator Johnson committing to the Program. We enclose the public version of our submission with this letter and have provided a version containing confidential business information (CBI) in a sealed and separately labeled envelope in accordance with EPA's applicable regulations and Appendix B of the Guidance. We also enclose two CD-ROM's containing the CBI and public versions of the submission as requested.

Emissions:

Our submission today addresses Dyneon's ongoing use of PFOA in its fluoropolymer manufacturing operations and products. As detailed in our March 1st letter committing to the Program, Dyneon continues to use PFOA at its Gendorf, Germany facility as a necessary fluoropolymer manufacturing aid. Accordingly, our submission includes Gendorf "Facility Report on Product Content" (Appendices C and D to the Guidance) as well as a Summary of Reductions in Emissions and Product Content (Appendix F to the Guidance) for the current reporting year of 2006. Notably, Dyneon has been using a PFOA "capture for recycle"

technology at its Gendorf, Germany facility for a number of years.[1] As demonstrated by the Facility and Summary Emissions Reports, this technology, which allows for PFOA recapture and reuse, has resulted in reductions in PFOA emissions of 74 percent since the baseline year.

Facility Reports and a Summary Emissions Report also have been completed for the current reporting year of 2006 at Dyneon's fluoropolymer manufacturing operations co-located at 3M's Decatur, Alabama facility. As the Agency is aware, Dyneon ceased using PFOA at its Decatur operations as of the end of 2004, although fluoroelastomer production does continue without the use of fluorochemical emulsifier during polymerization. However, even during its period of PFOA use -- as demonstrated by air modeling and other information submitted to the PFOA ECA docket -- Dyneon had extremely low PFOA emissions associated with its Decatur operations.[2] With its elimination of PFOA use the Facility and Summary Emissions Reports reflect that Dyneon now has no PFOA or higher homologue emissions from its Decatur fluoropolymer operations.[3]

Product Content:

Our submission also includes a Facility Report on Decatur and Gendorf Product Content (Appendix D to the Guidance) and a Summary Product Content Report (Appendix F to the Guidance) for all Dyneon fluoropolymer products produced at its Gendorf and Decatur operations. These Reports reflect substantial PFOA product (*i.e.*, dispersions and non-dispersions) content reductions, indicating that Dyneon likewise is well ahead of schedule in its progress towards the Program's product goals.

This submission provides new information on Dyneon's PFOA product content reduction efforts focused on dispersion products. In particular, Dyneon informed EPA in a January 10, 2005 letter of its plan to offer for commercial sale only "reduced APFO PTFE dispersions" by the end of the second quarter 2005. These reduced APFO dispersions continue to be 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. In 2006, Dyneon converted the rest of our commercial aqueous fluoropolymer dispersion-based products to "reduced APFO" dispersions, 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. Dyneon also has licensed to other fluoropolymer producers this technology to reduce the APFO content of fluoropolymer dispersions along with our technology to recover and reuse APFO from waste streams.

3M and Dyneon support the 2010/15 PFOA Stewardship Program, and as our submission reflects, continue to achieve substantial progress towards meeting the Program's emissions and product content reduction goals. 3M and Dyneon would appreciate the opportunity to discuss

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1 As noted in a letter to the Agency dated January 10, 2004, Dyneon not only developed and implemented this technology at its Gendorf facility, but also offered the technology for license to other fluoropolymer producers.

2 OPPT 2003-0012-0321, OPPT 2003-0012-0322

the enclosed submission with the Agency. In the meantime, please do not hesitate to contact Dr. George Millet or me with any questions.

Very truly yours,

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cc: Charles. M. Auer – US EPA