



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

AUG 18 2000

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

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Mr. Masanobu Yumoto
Dainippon Ink & Chemicals, Inc.
1-3 Takasago Takaishi-shi
Osaka, Japan 592-0001

Dear Mr. Yumoto:

We received your June 21, 2000 facsimile concerning perfluorooctyl sulfonate (PFOS). In your letter, you requested to meet with the Agency concerning critical uses of PFOS. You noted that Dainippon Ink & Chemicals Inc. (D.I.C.) has decided to phase out PFOS chemicals for water and oil repellent uses and some polymer additive uses. You also noted that a number of your U.S. customers import PFOS-containing products for "critical uses" which may differ from uses 3M has discussed with the Agency.

The Agency is prepared to work with industry, both manufacturers and users, to assist in review of critical uses of PFOS to ensure that good decisions are made in those cases where risk/risk tradeoff issues are presented by the phaseout decision. The Agency welcomes the opportunity to discuss this situation with you and to hear your concerns for these uses of the products and also to discuss substitutes.

As stated at the June 19th meeting at the American Chemistry Council (ACC), the Agency believes that continued manufacture and use of PFOS represents an unacceptable technology that should be eliminated to protect human health and the environment from potential severe long term consequences. Based on available information, PFOS does not appear to break down in the environment. This means that it is a persistent chemical that can remain in the environment for a long time after it is released. Recent information indicates that PFOS is much more widespread in the environment than anyone had known or expected. PFOS has a strong tendency to accumulate in the tissues of humans and animals and, based on the results of recent toxicity testing, could potentially pose a risk to human health and the environment.

EPA is currently examining appropriate regulatory alternatives necessary to protect human health and the environment in light of 3M's phaseout decision on PFOS. EPA has also shared its information with other governments, including bringing it to the attention of the member states of the Organization for Economic Cooperation and Development (OECD).

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Several countries, including the UK, the US, Canada, and Japan, have agreed to share responsibility for an international data collection and risk assessment effort, with an eye toward completion of a preliminary screening-level assessment by this fall to determine what further activities the OECD may wish to take with regard to PFOS chemicals. I have, as a courtesy, provided a copy of this response to government officials in Japan.

If you would like to arrange a meeting to discuss these issues, please contact Ms. Karen Lannon at (202) 260-2797.

Sincerely,



Charles M. Auer
Director
Chemical Control Division

cc: Yuho Shishiyama, MITI
Jun Yoshida, MHW
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