

3 pgs

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To: Robert J Giraud <Robert.J.Giraud@USA.dupont.com>
cc: John Blouin/DC/USEPA/US@EPA, Rich Leukroth/DC/USEPA/US@EPA, David.Menotti@shawpittman.com
Subject: Re: Fluoropolymers incineration Table 1 for ECA

As per yesterdays teleconference discussion, I put together a Draft strawman depicting one possible way we could handle some of the uncertainties of the proposed incineration testing program.

Robert and John: I especially need you to develop appropriate language for the footnotes in the Table for the triggers and technical consultations.

David: Once I see how these footnotes come together I will be better able to fill in the ECA document text that supports the footnote language. I have already drfted most of the ECA text for this document and plan to initiate the initial EPA internal review today or tomorrow.

Things seem to be moving along as well as can be exected and I predict that we should be able to move along to the Telomer incineration ECA after our next conference call on Oct 8th.

P.S. If you have a few minutes please give some thought to those elements of the Telomer ECA that are different and will need special consideration (e.g., how are we going to ID the test substances... will the same kind of appendix work for the telomers or will we need to do something different? Again, being sensitive to those CBI issues.

Table 1 REQUIRED TESTING, TEST STANDARDS, REPORTING AND OTHER REQUIREMENTS FOR REPRESENTATIVE FLUOROPOLYMERS COMPOSITE TEST SUBSTANCES

| Phase I Testing for Fluoropolymer Composite Test Substances | Test Standard | Deadline for Final Report (Months)¹ |
|--|--|---|
| Stoichiometric analysis | (see appendix C as annotated in appendix D) | ?? |
| Thermogravimetric analysis | ASTM E1641 | ?? |
| Quantitative PFOA transport | ?? (see appendix C as annotated in appendix D) | ?? |

| Phase II Testing for Fluoropolymer Composite Test Substances² | Test Standard | Deadline for Final Report (Months) |
|---|--|---|
| Laboratory-scale thermal degradation testing | ?? (see appendix C as annotated in appendix D) | ?? |

¹ Number of months after the effective date of the Order that incorporates this ECA when final report is due. Interim status reports, describing the status of all testing to be performed under this ECA, must be submitted by the Companies to EPA every 6 months beginning six months from the effective date of this ECA until the end of the ECA testing program (see Part VIII. E. and Part XIII. of this ECA).

² As described in Part VI.C. of this ECA, before work under the Tier II Testing segment is conducted, EPA has agreed to a Technical Consultation with the Test Sponsors to review the data obtained from Phase I Testing and to determine the feasibility of applying the test standards for laboratory-scale thermal degradation testing under Phase II Testing. [?? or something like this ??]

| Phase III Reporting for Fluoropolymer Composite Test Substances³ | Test Standard | Deadline for Final Report (Months) |
|--|----------------------|---|
| Exposure Assessment Report | (see Appendix F) | ?? |

³ Trigger text to Exposure Assessment Report.....