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Subject: Next PFOA incineration ECA development teleconference

REMINDER: Please mark your calendar and plan to call in for the next PFOA Incineration ECA ?Drafting Party? teleconference to discuss the Test Standard(s) for the fluoropolymer and telomer incineration ECAs. The teleconference will be from 2-4 on Wednesday, October 22. Robert Giraud will be e-mailing the call in number early next week.

Summary of Progress to date:

Initial efforts of the ?Drafting Party? focused on developing the ECA for fluoropolymers. Early discussions discovered that the incineration testing program could be logically structured into two phases and incorporate triggers to describe a variety of potential test program outcomes. Drafting activities have focused on clarification of technical aspects of the testing program and developing ECA text to describe the test substance(s) and test standards that will be applied to the ECA. This will include a series of Appendices that will be attached to the ECA document.

As work progressed in developing details for the test standards for the fluoropolymer incineration testing program the ?Drafting Party? discovered that, with minor changes to the text, these efforts will carry over to the ECA for telomers. As a result, the teleconference scheduled for October 22 will be broadened to include discussions for developing both the fluoropolymer and telomer incineration ECAs.

A key element of the ECA is Table 1 which describes the required testing, test standards, reporting and other requirements for the testing program. Attached as pdf files to this email are draft Table 1 documents for both the fluoropolymer and telomer ECAs.

Robert Giraud plans to circulate revised documents for the test standard(s) Appendix prior to the October 22 teleconference. He will also make available, as appropriate so as not to reveal CBI, those portions of other ECA appendices for describing the procedure for developing the test substance composites, etc.

I look forward to working with you as we develop these ECAs. Please contact me if you have questions or need additional information about the incineration ECA ?Drafting Party? activities.

- Attachments: 1) Table 1. Telomer Combustion Testing Program
- 2) Table 1. Fluoropolymer Combustion Testing Program.



Table\_1\_fluoropolymer.dft.PE Table\_1\_telomer.pdf

Table 1 REQUIRED TESTING, TEST STANDARDS, REPORTING AND OTHER REQUIREMENTS FOR THE LABORATORY-SCALE COMBUSTION TESTING OF FLUOROPOLYMERS

Phase I PFOA Transport Testing	Test Standard	Deadline for Final Report (Months) <sup>1</sup>
Quantitative PFOA transport analysis <sup>2</sup>	?? (see appendix C as annotated in appendix D)	?TBD?
Phase II Fluoropolymer Combustion Testing	Test Standard	Deadline for Final Report (Months)
Stoichiometric analysis	(see appendix C as annotated in appendix D)	?TBD?
Combustion stoichiometry	(see appendix C as annotated in appendix D)	?TBD?
Thermogravimetric analysis	ASTM E 1868-02 as annotated in Appendix “?”)	?TBD?
Laboratory-scale combustion testing	?? (see appendix C as annotated in appendix D)	?TBD?
Release assessment report <sup>3</sup>	(see Appendix “?G?”)	?TBD?

<sup>1</sup> 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, through the FMG, 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).

<sup>2</sup> As described in Part VI. A. and B. of this ECA, in the event that the recovery for either PFOA or fluorine is greater than 70% then testing will proceed to Phase II Combustion Testing; or, in the event that either the PFOA or fluorine is less than 70% then the Companies, through the FMG, will initiate a technical consultation meeting with EPA. The outcomes of the technical consultation meeting are described in Part VII of this ECA.

<sup>3</sup> In the event that Phase II Testing identifies measurable PFOA resulting from the combustion testing for any or all of the four fluoropolymer composite test substances, then the Companies, through the FMG, will prepare a release assessment report to put into perspective the relevance of the laboratory-scale combustion testing data with respect to municipal incineration operations in the United States. Where measurable PFOA is defined to be at or above the level of quantization (LOQ) (? 50 ppt ?).