

Greg Fritz

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Subject: Re: revised Appendices E.2 and C.2 based on Jan. 21 FP incin drafting comm call

Hi Robert

I) Missed you at the 01/22/04 conference call, here's what I've been tasked with for changes to Appendix A.4:

Page A-1 Section 4.1 Sentence 1 lines 1-3 has been changed

For each fluorotelomer based polymer (FTBP) listed in Appendix A.1, the corresponding telomer-based polymer product (TBPP) component for each test substance composite will be submitted to the compositing laboratory. Each company will collect....

Page A-1 Section 4.1 Second paragraph line 32 another sentence will be added

Copies of the Chain of Custody forms, identifying the company name and the generic chemical name, will be submitted simultaneously to the EPA as described in part XIV of this ECA.

Page A-2 Section 4.2 Sentence 1 lines 1-3 has been changed

The TBPPs are aqueous dispersions with nominally 20% solids, which contain the FTBPs listed in Appendix A.1.

EPA asserts that these changes are necessary for clarity and consistency in the ECA.

II) Additional information needs for finalizing the Appendix A.4

A sample calculations for determining the amounts of TBPP components to be formulated into the composite should be provided. Robert, the example below is my best approach to performing these sample calculation, so the compositing lab will have some guidance.

Example 1 Companies A, B, and C each provide 25 mL samples A, B, and C, respectively.

An aliquot for each sample is subjected to Wickbold torch method for total fluorine content.

Sample A is 2% total fluorine. Sample B is 4% total fluorine. Sample C is 8% total fluorine.

Some assumptions are made to simplify the analysis:

Total Fluorine measured comes from only 1 source (the FTBP which is derived exclusively from telomer 8-2 alcohol).

The same quantity of TBPP was tested under the Wickbold analysis. (If different quantities of test substance were analyzed the results must be normalized for sample size.) We'll assume sample sizes were uniform across the testing. We also assume that the density of the sample are uniform (in that a dispersion that is 80% water will have an approximate density of 1 g/L). If these assumptions do not hold additional calculations accounting for factors like sample size and product density may need to be

developed.

So for composite 1 (made by combining Samples A, B, and C):

4 mL of Sample A, corresponding to ~ 4 g containing 0.08 g F (4 g sample x 0.02 g F / g sample)
2 mL of Sample B, corresponding to ~ 2 g containing 0.08 g F (2 g sample x 0.04 g F / g sample)
1 mL of Sample C, corresponding to ~ 1 g containing 0.08 g F (1 g sample x 0.08 g F / g sample).

Whether these liquids are combined first (4.2.1) or dried first separately and the solids combined (4.2.2) does not matter after this. The uniform action of the mortar and pestle on the solids will not impact these calculations.

I think having these calculations as a separate example section 4.2.3 after everything would be useful

(page A-4 line 20)

III) for clarity a flow chart showing how CBI is handled would be beneficial. Indicate who knows what , who gets what info,

TRP companies to 3rd party [chemical name , CAS #, composite #]
3rd party to compositing labs [generic name assigned, composite #, test results]
testing labs to docket [generic name , composite #, test results]

IV The compositing Lab should have no CBI

Page A-4 Section 4.3 lines 40 - 43

Since the composite labs should have no association with CBI lines 40 - 43 can be deleted????

V) A report from the compositing lab has to be more developed in the verification (4.3) section.

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