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OPP-2003-0071-0072



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02/19/04 05:57 PM

To: Greg Fritz/DC/USEPA/US@EPA  
cc: David.Menotti@shawpittman.com, aweidman@socplas.org,  
robert.j.giraud@usa.dupont.com, Rich Leukroth/DC/USEPA/US@EPA,  
John Blouin/DC/USEPA/US@EPA  
Subject: Proposed tables and paragraph for Incineration ECA

Greg,

Attached to this email are three files. One is the draft of "Table 1" as requested in the Jan 6, 2004 letter from Mary Ellen Weber.

The second is a draft Table 2 intended as a substitute for the proposed Table 2 in that letter. Please note that at the end of this Table is another table containing the commonly used fluoromonomers, their nicknames, molecular weights, and CAS Numbers, for your information and guidance.

The third is the draft paragraph for the cover letter that accompanies these Tables. This paragraph was created in response to our Feb 4 Incineration ECA Drafting Team phone call discussion on the subject.

Please look them over and discuss them at your next Incineration ECA Drafting Team phone call. If you have any questions prior to the phone call, please contact David Menotti or me. My phone number is 651-733-5637.

Regards,

George

(See attached file: Generic Composite Component Table 1 10.02.04.doc) (See attached file: Generic Table 2 Polymer Composition 10.02.04.doc) (See attached file: Draft Incin comp letter para 05.02. 04.doc)



Generic Composite Component Table 1 10.02.04 Generic Table 2 Polymer Composition 10.02.04



Draft Incin comp letter para 05.02. 04.d

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**COMPOSITE COMPONENT INFORMATION TABLES FOR FLUOROPOLYMERS**

**CONTAIN CONFIDENTIAL BUSINESS INFORMATION AND TRADE SECRETS; NOT SUBJECT TO DISCLOSURE UNDER THE FREEDOM OF INFORMATION ACT. DOES NOT CONTAIN NATIONAL SECURITY INFORMATION- OPPT-2003-0012.**

**Table 1 – GENERIC Composite Component Identification Information**

9CI Name	CBI	Generic Name	CASRN/ PMN #	CBI	Publicly accessible Number	Composite #	CBI
Ethene, tetrafluoro-, homopolymer,		PTFE	9002-84-0			1	
Propane, 1,1,1,2,2,3,3-heptafluoro-3- [(trifluoroethenyl)oxy], polymer with tetrafluoroethene		Modified PTFE	26655-00-5			1	
1-Propene, 1,1,2,3,3,3-hexafluoro-, polymer with tetrafluoroethene		FEP	25067-11-2			2	
Propane, 1,1,1,2,2,3,3-heptafluoro-3- [(trifluoroethenyl)oxy], polymer with tetrafluoroethene		PFA	26655-00-5			2	
Ethene, tetrafluoro-, polymer with trifluoro(pentafluoroethoxy)ethene		PFA	31784-04-0			2	
Propene, 1,1,2,3,3-hexafluoro-, polymer with 1,1-difluoroethene and tetrafluoroethene		THV	25190-89-0			2	
1-Hexene, 3,3,4,4,5,5,6,6-nonafluoro-, polymer with ethene and tetrafluoroethene		ETFE	68258-85-5			2	
1,1,2,3,3-hexafluoro-, polymer with ethene and tetrafluoroethene		HTE	35560-16-8			2	
1-Propene, polymer with tetrafluoroethene		Base Resistant Elastomer	27029-05-6			3	

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**COMPOSITE COMPONENT INFORMATION TABLES FOR FLUOROPOLYMERS - Continued**

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**Table 1 – GENERIC Composite Component Identification Information**

9CI Name	CBI	Generic Name	CASRN/ PMN #	CBI	Publicly accessible Number	Composite #	CBI
1-Propene, polymer with 1,1-difluoroethene and tetrafluoroethene		Base Resistant Elastomer	54675-89-7			3	
Ethene, tetrafluoro-, polymer with trifluoro(trifluoromethoxy) ethene		Perfluoro-elastomer	26425-79-6			3	
Ethene, chlorotrifluoro-, polymer with 1,1-difluoroethene		CTFE Elastomer	9010-75-7			3	
	Y	Low Temperature Elastomer			EPA Accession No. XXXXX	3	
1-Propene, 1,1,2,3,3,3-hexafluoro-, polymer with 1,1 -difluoroethene		Copolymer Elastomer	25901 1-17-0			3	
1-Propene, 1,1,2,3,3,3-hexafluoro-, polymer with 1,1-difluoroethene and tetrafluoroethene		Terpolymer Elastomer	190-89-8			3	
Ethene, tetrafluoro-, homopolymer,		PTFE Dispersion	9002-84-0			4	
1-Propene, 1,1,2,3,3,3-hexafluoro-, polymer with tetrafluoroethene		FEP Dispersion	25067-11-2			4	
Propane, 1,1,1,2,2,3,3-heptafluoro-3-[(trifluoroethenyl)oxy], polymer with tetrafluoroethene		PFA Dispersion	26655-00-5			4	
Ethene, tetrafluoro-, polymer with trifluoro(pentafluoroethoxy)ethene		PFA Dispersion	1784-04-0			4	
Propene, 1,1,2,3,3,3-hexafluoro-, polymer with 1,1 -difluoroethene and Tetrafluoroethene		THV Dispersion	25190-89-0			4	

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Microsoft Word – Generic Table 2 Polymer  
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**COMPOSITE COMPONENT INFORMATION TABLES FOR  
FLUOROPOLYMERS**

**CONTAIN CONFIDENTIAL BUSINESS INFORMATION AND TRADE SECRETS; NOT SUBJECT TO DISCLOSURE UNDER THE FREEDOM OF INFORMATION ACT. DOES NOT CONTAIN NATIONAL SECURITY INFORMATION- OPPT-2003-0012.**

**Table 2 – Fluoropolymer Monomer Composition Information**

<b>Polymer: PTFE</b>	<b>CAS No.: 9002-84-0</b>			
<b>Monomer</b>	<b>CAS No.</b>	<b>CBI</b>	<b>Weight %</b>	<b>CBI</b>
TFE	116-14-3	N	100	N

<b>Polymer:</b>	<b>CAS No.:</b>			
<b>Monomer</b>	<b>CAS No.</b>	<b>CBI</b>	<b>Weight %</b>	<b>CBI</b>

<b>Polymer:</b>	<b>CAS No.:</b>			
<b>Monomer</b>	<b>CAS No.</b>	<b>CBI</b>	<b>Weight %</b>	<b>CBI</b>

<b>Polymer:</b>	<b>CAS No.:</b>			
<b>Monomer</b>	<b>CAS No.</b>	<b>CBI</b>	<b>Weight %</b>	<b>CBI</b>

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<b>Polymer:</b>	<b>CAS No.:</b>			
<b>Monomer</b>	<b>CAS No.</b>	<b>CBI</b>	<b>Weight %</b>	<b>CBI</b>

<b>Polymer:</b>	<b>CAS No.:</b>			
<b>Monomer</b>	<b>CAS No.</b>	<b>CBI</b>	<b>Weight %</b>	<b>CBI</b>

<b>Polymer:</b>	<b>CAS No.:</b>			
<b>Monomer</b>	<b>CAS No.</b>	<b>CBI</b>	<b>Weight %</b>	<b>CBI</b>

<b>Polymer:</b>	<b>CAS No.:</b>			
<b>Monomer</b>	<b>CAS No.</b>	<b>CBI</b>	<b>Weight %</b>	<b>CBI</b>

<b>Polymer:</b>	<b>CAS No.:</b>			
<b>Monomer</b>	<b>CAS No.</b>	<b>CBI</b>	<b>Weight %</b>	<b>CBI</b>

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<b>Common Monomers Used in Fluoropolymers</b>			
<b>Acronym</b>	<b>Monomer name</b>	<b>CAS Number</b>	<b>Molecular Weight</b>
CTFE	Chlorotrifluoroethylene	79-38-9	116.5
TFE	Tetrafluoroethylene	116-14-3	100
HFP	Hexafluoropropylene	116-15-4	150
VDF	Vinylidene fluoride	75-38-7	64
PEVE	Perfluoroethyl vinyl ether	10493-43-3	216
PMVE	Perfluoromethyl vinyl ether	1187-93-5	166
PPVE	Perfluoropropyl vinyl ether	1623-05-8	266
E	Ethylene	74-85-1	28
P	Propylene	115-07-1	42

Draft para for Incineration composite letter as of 5 Feb 04

“As a result of an understanding reached during the Incineration ECA Drafting Team teleconference on 4 February 2004, we are providing monomer ratio data for the fluoropolymers chosen for Incineration testing. This is instead of providing a list of monomers and reactants used to make each of those polymers as requested in the 6 January 2004 letter from Mary Ellen Weber to the members of the FMG. FMG members agreed to provide fluoropolymer composition data expressed as weight percent of each monomer present in the fluoropolymer at a level of 1% or greater. The data is presented in a table similar to Table 2 on page 5 of EPA’s Premanufacturing Notice form 7710-25 (Rev. 5-95)”