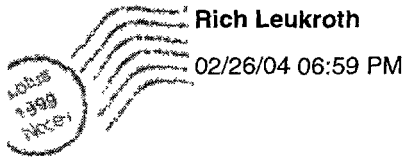


OPPT-2003-0071-0082



Rich Leukroth

02/26/04 06:59 PM

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Subject: ACTION item: Incineration ECAs Part IX add in text

Since a lot of folks were not able to make the joint incineration ECA development meeting on 2/25/04 I've put together a quick summary of our discussions. Also I need your comments on the suggested text add in for Part IX (see item # 1) below).

Next Meeting is scheduled for March 1 from 9 am - 11 am.

Call in phone number will be: [REDACTED]

code: * [REDACTED] * [don't forget the " * " before and after the code]

Please mark your calendar and plan to participate in the March 1 Final Draft wrap-up meeting / teleconference.

{Thanks David Menotti for providing the call in phone number}

2/25/04 Summary:

We kept an open agenda for the joint incineration ECA development meeting on 2/25/04. As you will recall the goal was to move forward in the ECA compilation effort with the goal of having a completed document available for distribution to the Interested Parties by the end of February.

Although we had some good discussion there was no agreement on finalizing Appendix F (re: QAPP). As a result we decided to send the compiled Final Draft ECA document with appendices to the IPs and seek their input on Appendix F. David Menotti and Gautham Srinivasan are in the process of developing an explanation of the impasse to the IPs that will accompany the document.

Following this discussion the group paged through both ECA "cover" documents making mostly housekeeping, typographical fixes and corrections. The group agreed that the proposed method for identifying a Company's obligation to Phase I was best handled as a footnote on the signature pages for both agreements.

Changes were made to two sections of the ECA "cover" documents that are highlighting here for your comment.

1) During discussions at the 2/25/04 Joint Drafting Committee meeting to develop the Incineration ECAs for telomers and fluoropolymers FMG/TRP brought to our attention that additional changes were needed in Part IX. C. to indicate that various ECA appendices will be used as standard operating procedures by the Dayton Lab. In addition, text was also needed to explain that the designated composite assembly facility(ies) will use Appendix A.4.

Below in bold red is suggested text to be incorporated into this section of the ECAs... Please comment ASAP.

IX. STANDARDS FOR CONDUCTING TESTING

C. All testing required by this ECA must be conducted in accordance with the EPA Good Laboratory Practice Standards (GLPS) found at 40 CFR part 792.

Appendices C.1, C.2.4, and D.1 will be used to satisfy GLPS requirements for standard operating procedures under 40 CFR 792.81 for Phase I quantitative PFOA

transport testing and Phase II laboratory-scale combustion testing.

Assembly of the composite test substances must be performed in accordance with Appendix A.4. A QAPP(s) detailing composite assembly(ies) must be submitted in accordance with EPA QA/R5 guidance to address needed elements to ensure data quality, integrity, and usability (see Part X of this ECA).

2) David and Robert suggested additional changes to footnote #3 (see page 6 in the fluoropolymer document, or pg 5 in the telomer document that I sent out on 2/23/04). This change was carried over to footnote #9 in Table I and Appendix E.2.

Footnote #3 *"In the event that Phase II Fluoropolymer Incineration Testing identifies measurable levels of PFOA (where measurable PFOA is defined to be at or above the limit of quantitation (LOQ) as defined in Appendix D.2) resulting from the incineration testing for any or all of the fluoropolymer composites tested under this ECA, as defined in C.2.5.5 (see Part II and Appendix A.1-A.4 to this ECA), the Companies will prepare a release assessment report (see Table 1 and Appendix E.2 to this ECA) to place in perspective the relevance of such measurable levels in the laboratory-scale incineration testing results with respect to full-scale municipal and/or medical waste incinerator operations in the United States."*

3) Other changes were incorporated into Table 1 footnotes to a) provide a definition for a month, b) clarify the schedule for the fluoropolymer final report, and c) provide contingency if not all the composite components are delivered on time.

I'm looking forward to receiving your comments on the Part IX add in text and if you have any comments on the footnote 3 change.

Robert is working to complete the Appendices for the Final Draft compilation. He promised to have these materials out earlier today and I'm certain that he will be transmitting this very soon. Please be prepared to discuss these materials on Monday.

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