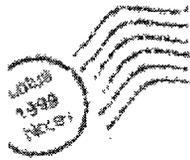


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OPPT-2003-0071-0089



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03/01/04 11:35 AM

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

During the teleconference this morning we agreed to the following text for Part IX C. of the incineration ECAs. I have incorporated this text into both the telomer and fluoropolymer ECAs that will be distributed to the IPs.

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. The standard operating procedures (SOPs) required by 40 CFR 792.81 shall consist of Appendices C.1., C.2.4., and D.1 for Phase I PFOA transport efficiency testing, Phase II thermogravimetric analysis, and Phase II combustion testing.

The compositing facility(ies) tasked to assemble the test substance composite(s) will not be subject to GLPS as specified at 40 CFR part 792. 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 (as specified in Appendix F) to address needed elements to ensure data quality, integrity, and usability (see Part X of this ECA).

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