



David Menotti
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09/30/2004 11:43 AM

To Rich Leukroth/DC/USEPA/US@EPA, Gautam
Srinivasan/DC/USEPA/US@EPA
cc robert.j.giraud@usa.dupont.com
bcc
Subject Fluoropolymer ECA packages/ needed corrections

Rich and Gautam:

The FMG member companies met late yesterday to discuss how to make the necessary corrections to both the public and CBI versions of the fluoropolymer incineration ECA packages. We unanimously agreed that the appropriate way to proceed is to have EPA make the needed corrections, and send corrected pages to the signatories for insertion in the packages prior to signature.

You had previously requested that we make changes by hand-editing the offending pages, initialing the changes, and then signing the documents. After some discussion, we concluded that the logistics implicated by such an approach were decidedly inefficient, to put it mildly. What would be implicated, as indicated in my previous email to Gautam, would be the creation (e.g., by me) of a set of hand-corrected master pages, and then the circulation of these to each of the companies for insertion in the documents prior to signature. The first step in this process would be getting a copy of the final package, which so far has only been distributed to the companies. But once this was all accomplished, we would only have been half way home; the CBI versions also would have to have been corrected, which could only be done by each company (with attendant possibilities for mistakes). And on top of that, at least one company apparently has problems with its CBI version, which would also have to be addressed.

Again, we conclude that the way to proceed here is to hold our course, and have EPA, which has had responsibility for these documents from the beginning, take responsibility for getting us home.

You already are aware of the errors that have been detected in the public version of the package by Asahi and DuPont, but I have attached a copy of my email on this subject, for your convenience. I have also attached the changes requested by Dyneon to the public version. These include errors in polymer nomenclature that require correction, and the deletion of two fluoropolymers from the lists of composite constituents, on the basis that Dyneon is going to stop manufacturing them in the near future using APFO. Daikin has also identified an error in polymer nomenclature, but this same error was already brought to your attention by Asahi and DuPont, so it is already in play. Finally, I note that Dyneon has identified additional needed changes in their CBI version of the package; for obvious reasons, George Millet is dealing with you directly on these issues.

Please note that our objective is to quickly fix these problems, so that we can move forward with these programs. We are sure that you share this objective. We would be very disappointed, and I am sure you would be as well, if we were not able to report jointly at the ECA meetings in early October that both ECAs have been signed and are awaiting publication in the Federal Register. Toward that end, the Telomer packages, which have not presented these problems, are in the process of being signed and returned to the Agency. The Asahi package, for example, was mailed earlier this week.

David E. Menotti
202-663-8675

(See attached file: Dyneon changes.PDF)

----- Forwarded by David Menotti/SPPT/US on 09/30/2004 10:17 AM -----

David Menotti

Leukroth.Rich@epamail.epa.gov
09/22/2004 08:27
l-william.buxton@usa.dupont.com
AM
packages/ needed corrections

To:
cc:
Subject: Fluoropolymer ECA

Rich:

The reviewers for the companies have detected several additional errors in the Fluoropolymer ECA packages, which need to be corrected.

The first category of problems are addressed in the attached fax from Bill Buxton at DuPont (302-999-4658). He has identified two problems. The first, and most important, is the listing of the substance with CAS No. 31784-04-0 as a constituent of the Aqueous Dispersion Composite. This substance is no longer being manufactured, and consequently must be deleted from the list of composite constituents. Bill has provided hand-annotated pages, showing where this deletion should be made. The second problem is with the DuPont address that is listed on page 14 of the cover document; again, he has provided the needed correction, by hand annotation of the page in question.

The other problem area is on page A.4-2. In the first line on this page, the first, second and fourth substance are identified incorrectly. In particular, "EEP" should be "FEP", "PEA" should be "PFA", and "ETEE" should be "ETFE."

I suggest that you follow the same procedure you followed for the last set of corrections, i.e., prepare corrected pages, and courier them to the company signatories.

Hopefully, this will be the last of the changes that we have to deal with.

David

(See attached file: B00203D4.PDF)

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postmaster@shawpittman.com. Thank You. Dyneon changes.PDF B00203D4.PDF