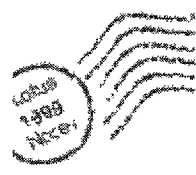


5pgs

OPPT-2003-0071-0015

 Rich Leukroth
10/07/03 04:27 PM

To: Robert J Giraud <Robert.J.Giraud@USA.dupont.com>
cc: David.Menotti@shawpittman.com, John Blouin/DC/USEPA/US@EPA,
(bcc: Rich Leukroth/DC/USEPA/US)
Subject: Re: text to review during 1 pm Oct. 8 fluoropolymer incin testing
DraftingCommittee call

Thanks for the follow-up. Today was actually my first day back in the office and it has been filled with one meeting after another. I did get to touch base with John earlier today only to find out that both he and I will be tied up at a Division Directors meeting on Wednesday and we will not be able to keep the 1p.m. teleconference with you and David. I apologize for the inconvenience. Would it be possible to reschedule our teleconference for Friday 10/10 at 9 a.m.?? This would also give me an opportunity to consolidate comments I received on the internal EPA review of the draft ECA that I circulated while I was out of the office.

I've made some comments (see red text below) to your e-mail. Hope I answered your questions.

Also, I note that the Table 1 in your front end piece is a bit different than what I had sent previously. Please have another look at the attached draft and let's discuss further.



Table_1_fluoro.pdf

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Robert J Giraud <Robert.J.Giraud@USA.dupont.com>



Robert J Giraud
<Robert.J.Giraud@US
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10/07/03 11:22 AM

To: John Blouin/DC/USEPA/US@EPA, Rich
Leukroth/DC/USEPA/US@EPA
cc: David.Menotti@shawpittman.com
Subject: text to review during 1 pm Oct. 8 fluoropolymer incin testing
DraftingCommittee call

John and Rich,

Thank you for your guidance over the past few weeks on what is needed for the appendices to the planned ECA for fluoropolymers incineration testing.

As we discussed, I have prepared a draft of the appendix dealing with what we are calling Phase I testing as well as some brief shell text to show how things fit together. While the shell text at the beginning of this document uses some of the structure from the example ECAs supplied by Rich, we understand that the actual ECA language will be prepared later. Again, this shell text is to help us convey to one another how the various aspects of this incineration testing program fit together as we have discussed on the phone.

We are providing this draft document to you as a pdf file and in WORD to facilitate mark-ups as you go thru it.

(See attached file: FP Incin Test Program draft 10-7-03.pdf) (See attached file: FP Incin Test Program draft 10-7-03.doc)

Dave and I look forward to our conference call on Wednesday afternoon October 8 at 1 pm. We look forward to a discussion of this document. The call-in details are as follows:

phone number: [REDACTED]
code: [REDACTED]

One of the questions that I have for Rich is the meaning/intent of the term "annotated" on the Table 1 pages of the ECA example language that you have shared with us.

Here's an example. Let's say we need to make a slight change to ASTM standard E1868 for the TGA endpoint and that this would involve say a change in specified temperature from 100 C to 120 C. Rather than re-writing the entire standard we would simply attach a copy of the ASTM standard to the ECA, handwrite at the top "As Annotated" and then change the appropriate text to read 100 C and write in 120 C. We use this "as annotated" approach only to tweak existing test standards.

Please note:

This is a draft document to facilitate our discussion as a drafting committee.

As John requested, line numbers are included on each page of the document. **Thanks this is a great help.**

As noted in the attached, Appendix A is under preparation and we are still evaluating whether other items need to be in Phase I described in Appendix B. **Have a look at my cut at the Table 1... I included three endpoints (stoichiometry, TGA, and PFOA transport)... does this work for you?**

We are still working on Appendix C testing plan information to assure that the level of definitiveness requested is provided. **This is key to moving the Thermal degradation ECA forward.**

Since we are also still working on developing a firm test schedule, the deadlines in the revised Table 1 of the attached document. the version of Table 1 herein has TBD (to be determined) for the reporting deadlines. **Least of our problems... we can fill this in as one of the last items to add into the ECA. For now we need to establish test standards and be clear on test substance identity, etc.**

We have found an ASTM standard (E 1868) for TGA that more closely reflects the TGA work historically done by UDRI (including the 3M program) and have therefore revised the TGA text to refer to E 1868.

Clarifying text and other notes in Italics are included in this draft document as internal comments shared among the drafting committee and are not intended to be in a more final version of the document.

Thank you in advance for your review and comment of this draft document as

a step toward our development of a proposal to bring to the Plenary at the end of this month.

Best Regards,

Robert Giraud

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FP Incin Test Program draft 10-7-03. FP Incin Test Program draft 10-7-03.c

DELIVERATIVE

Table 1 REQUIRED TESTING, TEST STANDARDS, REPORTING AND OTHER REQUIREMENTS FOR REPRESENTATIVE FLUOROPOLYMERS COMPOSITE TEST SUBSTANCES

Phase I Testing for Fluoropolymer Composite Test Substances	Test Standard	Deadline for Final Report (Months) ¹
Stoichiometric analysis	(see appendix C as annotated in appendix D)	??
Thermogravimetric analysis	ASTM E1641	??
Quantitative PFOA transport	?? (see appendix C as annotated in appendix D)	??

Phase II Testing for Fluoropolymer Composite Test Substances ²	Test Standard	Deadline for Final Report (Months)
Laboratory-scale thermal degradation testing	?? (see appendix C as annotated in appendix D)	??

¹ Number of months after the effective date of the Order that incorporates this ECA when final report is due. Interim status reports, describing the status of all testing to be performed under this ECA, must be submitted by the Companies to EPA every 6 months beginning six months from the effective date of this ECA until the end of the ECA testing program (see Part VIII. E. and Part XIII. of this ECA).

² As described in Part VI.C. of this ECA, before work under the Tier II Testing segment is conducted, EPA has agreed to a Technical Consultation with the Test Sponsors to review the data obtained from Phase I Testing and to determine the feasibility of applying the test standards for laboratory-scale thermal degradation testing under Phase II Testing. [?? or something like this ??]

Phase III Reporting for Fluoropolymer Composite Test Substances ³	Test Standard	Deadline for Final Report (Months)
Exposure Assessment Report	(see Appendix F)	??

³ Trigger text to Exposure Assessment Report.....