

Drafting Committee Report on Developing Incineration ECAs

**ECA Drafting Committee
Progress Report
on ECAs for
Incineration Testing Programs**

October 27-29, 2003

**Developing ECAs for the Incineration
Testing Programs**

- Presentation Overview
 - ECA drafting committee
 - Describe critical elements of the ECA
 - Explain how things have changed
 - Summarize accomplishments
 - Next steps

Drafting Committee Report on Developing Incineration ECAs

Incineration ECA Drafting Committee

- Robert Giraud
- David Menotti
- Bill Beers*
- Steve Korzeniowski*
- John Blouin
- Greg Fritz
- Rich Leukroth

* Telomers only

From Proposal to ECA

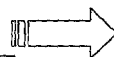
Technical Subgroup on Incineration Test
Methods for Fluoropolymers

Incineration Testing Proposal

August 19, 2003

Detailed Test Protocol Outline
Proposal, September 12, 2003

1. Introduction
The overall goal of this program is to determine if
incineration or belated closed cycle when for polystyrene
where the incineration is a relatively low-temperature process is
a potential source of PFA in the environment.
This document presents a detailed outline of a protocol for
a research program to conduct analytical testing.
Detailed test methods are necessary to minimize variable
sampling and analytical methods for PFA and as
experimental protocol for incineration testing.
Following completion of this document, a test protocol and
Quality Assurance System (QAS) can be prepared.

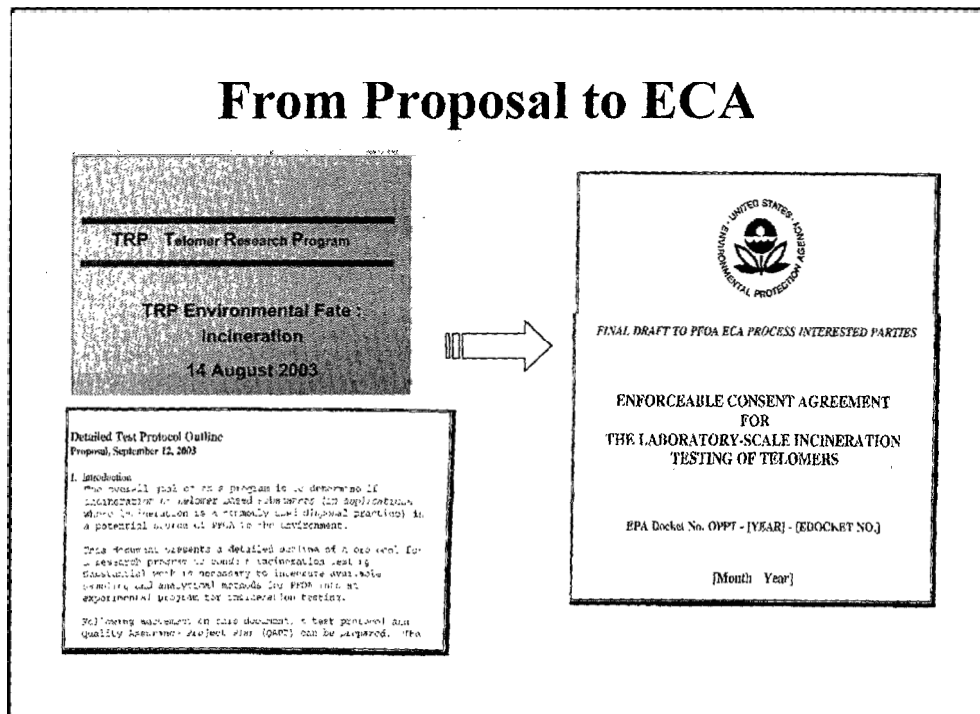


ENFORCEABLE CONSENT AGREEMENT
FOR
THE LABORATORY-SCALE INCINERATION
TESTING OF FLUOROPOLYMERS

EPA Docket No. OPPT - [YEAR] - [DOCKET NO.]

[Month Year]

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Critical Elements of the ECA

- Boilerplate language
 - Describes Testing Program and cross-references to **Table 1, Appendices, Attachments**
 - Enforceability
 - Expectations
 - Obligations
- Test substance identification
- Test standards
- Table 1

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Drafting Committee Activities

- Meetings & Teleconferences
(9/17; 9/24; 10/10; 10/14; 10/22)
- ECA Architecture (Table 1)
 - Phase I (PFOA Transport Testing)
 - Phase II (Incineration Testing)
- Appendix A (Test Substance)
- Appendix B (Test Standards)
- Appendix C (Study Protocols as Test Standards)
- Attachments to Appendices

Test Program Architecture

Phase I PFOA Transport Testing	Test Standard	Deadline for Final Report
Transport Efficiency	See Appendix B	TBD

If Phase I recovery < 70%, go to Technical Consultation (TC)

If Phase I recovery \geq 70% or if agreed in TC, go to Phase II

Phase II Incineration Testing For Test Substance Composites	Test Standard	Deadline for Final Report
Elemental Analysis ¹	ASTM D3176 or equivalent as described in Appendix C.1	TBD
Combustion Stoichiometry ⁵	See Appendix C.2	TBD
Thermogravimetric Analysis ⁶	ASTM E1868 as annotated in Appendix C.3	TBD
Laboratory-scale Combustion Testing ⁵	See Appendix C.4 - C.6	TBD
Release Assessment	See Appendix C.6	TBD

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Next Steps

- Drafting Committee completes ECA appendices and attachments
- EPA Drafts ECA document and compiles cross-walk with appendices and attachments
- Drafting Committee reviews Final Draft ECA
- Interested Parties comment on Final Draft ECA
- Drafting Committee incorporates comments
- Workgroups recommend ECA to EPA at Plenary