7pgs

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Subject: Revised Telomers Appendix A.4 based on Jan. 22 incin drafting committeecall

Greg,

Thank you very much for your e-mail. I am sorry that I missed the call. Based on the structure of your e-mail and a brief chat that I had with David on Thursday night EST, I understand that numeral I. items need to be addressed in the version that Rich is sending out on Friday Jan. 23 EST and that the other Roman numeral items require further work over the next few weeks as we finalize the ECA-related documents.

I. Please see revised Appendix A.4 attached. I have addressed all the changes requested in numeral I. of your e-mail. I have also made an editorial fix to the second sentence of section 4.2 of Appendix A.4 since FBTP will now have been explained earlier in the document. In the interest of clearer direction to the people following Appendix A.4 as a protocol down the road, I spelled out what I think you meant as to the specifics of where the chain of custody form copies should go at EPA. I used a blank for part of the docket number as I thought we didn't have a complete docket number for this yet.

(See attached file: App A.4 telomers incin test draft 1-23-04.pdf)

II. I need to think thru your suggestions on example(s) to give the compositing lab more guidance. As noted above, I believe you are OK with us revising and discussing revised text to address such example(s) in drafting committee correspondence and discussion after next weeks round of TWG meetings.

III. I will work with Steve K. and others to think thru your suggestion on a CBI flowchart before responding to this one.

IV. In the above revision deleted the lines from section 4.3 as you suggested.

V. I would like to discuss with you directly your thoughts on what you would like to see in the report from the compositing lab. Is it easier for you to do a call at 7 am or at say 6 pm? Depending on that, we can try to schedule a phone call for you to pass on your thinking before my return to the U.S.

Again, thank you for your e-mail and insightful suggestions.

If you have any questions, please let me know.

Best Regards,

Robert Giraud

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App A.4 telomers incin test draft 1-23-04.

APPENDIX A.4
PREPARATION OF FLUOROTELOMER-BASED POLYMER COMPOSITES

4.1 Assembly of Components

For each fluorotelomer based polymer (FBTP) listed in Appendix A.1, the corresponding telomer-based polymeric product (TBPP) component for each test substance composite will be submitted to the compositing laboratory. Each company will collect a minimum of 100 mL of first, quality production of a representative grade of TBPP, and send a minimum of 25 mL of each such TBPP component to a facility designated by the Telomer Research Program (TRP). Each company will store the remainder of each such TBPP component under conditions at or below ambient temperature for a period of 5 years. Both parts will be contained in new, unused packaging customarily used for product sample packaging or in new, unused polyethylene, polypropylene, or glass container(s).

Transmission of TBPP components for test substance composite preparation in this program will include formal Chain of Custody procedures. For each TBPP component for each test substance composite, each company will assign a unique non-CBI identifying name (e.g., unique generic chemical name) and identify which composite the component is to go into. This name and the identity of the composite it is to go into will be used as the "sample description" on the Chain of Custody form used when conveying TBPP component(s) to the compositing laboratory. The Chain of Custody form used when conveying TBPP component(s) to the compositing laboratory will also distinguish among the TRP member companies to verify that each company contributes to each applicable composite. A single copy of each Chain of Custody form used by each company when conveying TBPP component(s) to the TRP-designated facility, identifying the company name and the unique generic chemical name, will be submitted concurrently to the EPA at the following address:

Document Control Office (7407M)
Office of Pollution Prevention and Toxics (OPPT)
Environmental Protection Agency
1200 Pennsylvania Ave., NW, Washington, DC 20460-0001

The submission to such copies to EPA will be identified with Docket ID Number OPPT-_____ and the name of this ECA

(Laboratory-Scale Incineration Testing of Fluorotelomer Based Polymers).

The TRP-designated facility assembling the components may be the compositing laboratory or may be a single common alternate facility. If such an alternate facility is used, then new Chain of Custody form(s) will be prepared, as needed to remove CBI while assuring component distinction, to accompany the TBPP component to the compositing laboratory.

The deadline for each company to submit its TBPP components to the TRP-designated facility is shown in Table 1 of the ECA.

4.2 Preparation

The TBPPs are aqueous dispersions with nominally 20% solids, which contain the FTBPs listed in Appendix A.1. Each test substance will be an FTBP solids composite following dewatering and will be prepared as described in Section 4.2.1 or as described in Section 4.2.2 below.

Composite preparation will be conducted under laboratory conditions designed to prevent cross-contamination and designed to assure solids temperatures less than 60 °C.

The telomer product solids composites will be substantially free of inorganic constituents.

Following preparation of each composite, each composite will be placed in a polyethylene, polypropylene, or glass container and will be accompanied by a new Chain of Custody (for the composite(s)) until each composite reaches the incineration testing facility.

4.2.1 Mixing Followed by Dewatering

The composite preparation sequence via mixing followed by dewatering is follows:

1. For each composite, the relevant TBPP components will be gathered.

2. A portion of each of these TBPP liquids will be analyzed to determine the amount of FTBP solids via measurement of Total Fluorine as described in

Appendix D.3. The moisture content of a portion of each TBPP liquid will be determined as described in Appendix C.2.1.4.

3. The amount of each component TBPP liquid to go into a given composite will be established based on the Total Fluorine result from step 2 to assure that the FTBP solids of each component into a given composite will be present in equal proportions (on a Total Fluorine basis).

4. For each composite, the component TBPP liquids will be mixed according to the amounts from step 3 to form the composite as a liquid.

5. For each composite as a liquid, the liquid will be spread into sufficiently large aluminum pan(s). The material in the pan(s) will be dewatered via evaporation at ambient conditions (thereby assuring solids temperature less than 60 °C) in a laboratory hood (away from other potential sources of PFOA) for two days until the material is visibly free of excess water (i.e., visibly drip free). (A small amount of residual moisture is expected to be remaining in the dewatered material.)

6. The dewatered FTBP solids will be treated with liquid nitrogen as necessary to allow for easy release from the aluminum pan(s). The material will be transferred to a mortar and pestle and ground using liquid nitrogen as necessary to produce visibly consistent solids size.

4.2.2 Dewatering Followed by Mixing

The composite preparation sequence via mixing followed by dewatering is follows:

1. For each composite, the relevant TBPP components will be gathered.

2. A portion of each of these TBPP liquids will be analyzed to determine the amount of FTBP solids via measurement of Total Fluorine as described in Appendix D.3. The moisture content of a portion of each TBPP liquid will be determined as described in Appendix C.2.1.4.

3. The amount of FTBP solids for each TBPP component to go into a given composite will be established based on the Total Fluorine result from step 2 to assure that the FTBP solids of each component into a given composite will be present in equal proportions (on a Total Fluorine basis). The result from step 2 for Total Fluorine also establishes the minimum amount of TBPP liquid for each component needed for subsequent preparation steps.

4. For each component in each composite, an amount of the TBPP liquid greater than or equal to the minimum amount of each TBPP liquid from step 3 will be spread into sufficiently large aluminum pan(s). The material in each pan will be dewatered via evaporation at ambient conditions (thereby assuring solids temperature less than 60 °C) in a laboratory hood (away from other potential sources of PFOA) for two days until the material is visibly free of excess water (i.e., visibly drip free). (A small amount of residual moisture is expected to be remaining in the dewatered material.)

5. The dewatered FTBP solids will be treated with liquid nitrogen as necessary to allow for easy release from the aluminum pan(s). The material will be transferred to a mortar and pestle and ground using liquid nitrogen as necessary to produce visibly consistent solids size.

6. The dewatered FTBP solids from step 5 for each relevant component in the amount of FTBP solids based on the Total Fluorine result from step 2 will be mixed together to form each composite.

4.3 Verification

To verify adherence to Section 4.2, the laboratory preparing a given composite will generate a report describing how the composite was prepared. This report will be included in the final report for Phase II incineration testing.

The Total Fluorine content (as described in Appendix D.3) and the moisture content (as described in Appendix C.2.1.4) of each composite will be determined as noted in Appendix

C.2.1. The Total Fluorine content of each composite on a dry basis will be computed and included in the report prepared by the compositing lab.

The weighted average Total Fluorine content of the components of each composite will be computed on a dry basis based on the results from step 2 above and included in the report prepared by the compositing lab.