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To: Rich Leukroth/DC/USEPA/US@EPA cc: bill.beers@omnova.com, Stephen.H.Korzeniowski@USA.dupont.com, Robert.C.Buck@USA.dupont.com, david.menotti@shawpittman.com.

Robert.J.Giraud@USA.dupont.com, John Blouin/DC/USEPA/US@EPA, Greg Fritz/DC/USEPA/US@EPA, Gautam Srinivasan/DC/USEPA/US@EPA, Barbara Leczynski/DC/USEPA/US@EPA Subject: Re: ACTION item: Incineration ECAs Part IX add in text

Gang:

We propose the following as a substitute for the Part IX "add in" text:

"Except for the assembly of composite test substances (see Appendix A.4), the programs required by this ECA must be conducted in accordance with the EPA Good Laboratory Practice Standards (GLPS) 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 thermogravamatic analysis, and Phase II combustion testing."

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David

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