

OPPT-2003-0071-0097



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To: Rich Leukroth/DC/USEPA/US@EPA
 cc: david.menotti@shawpittman.com
 Subject: correction to Fluoropolymers Appendix A.1

03/15/04 01:52 PM

Rich,

Thank you for your leadership of the ECA drafting effort and for all your hard work putting together the package to go out to the interested parties earlier this month.

With all the things that had to get done to get the package out by March 2, it appears that a needed correction we discussed and agreed to during a drafting committee conference call on March 1 was inadvertently left out of the draft to the interested parties. Please see my 11:58 am March 1 e-mail to you. (Temporary e-mail limitations prevent me from forwarding that e-mail with this one.) I

However, I have repeated the text from the last paragraph of Fluoropolymers Appendix A.1 prior to the table with the new text in bold blue. This time, I have also figured out how to strike through original text that needs to be deleted in the text below (except I did not strike through the subscript x deleted as noted below.

Additionally, since March 1, I have conferred with the Fluoropolymers technical folks to ensure that I did not make any mistakes in the revised language. To that end, -(CF₂)_x- is replaced with -(CF₂CF₂)- without the subscript x and with some additional words to as accurately as possible make Greg's point. And, consistent with revisions elsewhere in the overall ECA document, I have replaced "dry non-melt PTFE homopolymer resin with dry non-melt fluoropolymer resin". Please see the revised paragraph below.

Subsequent analysis of the list of fluoropolymers received by EPA supported the conclusion that the individual chemicals listed below are representative of all known commercial fluoropolymer chemicals and the basic chemistries are represented by the four composite test substances that are subject to testing under this ECA (i.e., dry melt fluoropolymer resin, dry non-melt PTFE homopolymer fluoropolymer resin/gum, dry non-melt fluoroelastomer resin/gum, aqueous fluoropolymer dispersions) (see ECA Appendix A.2 and A.3). The structures of these fluoropolymers structure is predominantly include multiple -(CF₂CF₂)-, which under incineration conditions EPA believes can be a potential source of PFOA. For all fluoropolymer products used in commerce, the -(CF₂CF₂)- moiety is common to all polymers, and the composites to be tested under this ECA testing program (see Appendix A.2 - A.4) are representative of the individual component and non-component fluorochemicals.

Please correct this paragraph in the final version of the ECA.

If you have any questions or comments on the above, please let me know. And if you would like David or me to have one of the Fluoropolymers technical people contact Greg to discuss this further, please let me know that as well.

I appreciate your assistance.

Best Regards,

Robert Giraud

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