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Greg Fritz

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Subject: Re: Incineration ECA Drafting Committee proposed changes to A.1

The proposed changes to the structural analysis of fluoropolymers, upon rereading, has put back items I thought we had agreement on; namely, the description of the for composite types:

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 $-(CF_2CF_2)-$, which under incineration conditions EPA believes can be a potential source of PFOA. For all fluoropolymer products used in commerce, the $-(CF_2CF_2)-$ 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.

I believe these changes I propose were the final description we agreed to vis-a-vis how they are presented in A.2 :

- 15 • **Dry melt resins**
- 16 1. FEP, PFA, THV, ETFE, HTE
- 17
- 18 • **Dry non-melt resins and gums**
- 19 2. **Dry non-melt resins**
- 20 3. Fluoroelastomers (**dry non-melt gums**)
- 21
- 22 • **Aqueous dispersions**

Again these changes will have no major effect on the paper or composites. Thanks

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