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To David.Menotti@shawpittman.com, A  
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Leukroth/DC/USEPA/US@EPA, Robert J Giraud  
cc John Blouin/DC/USEPA/US@EPA

bcc

Subject Re: PFOA Incineration ECA Drafting Committee proposed  
changes to Appendix B.1

At the Telomer Working Group Meeting on Tuesday, March 30, 2004, an IP issued a verbal request for clarification on Appendix B.1 of the Incineration ECA. Specifically, the comment relates to the Modification to section 2.1 and 4.1 of ASTM E1868-02. Paraphrasing the comment: No explanation is afforded the reader as to why the modifications are necessary. The comment was responded to verbally by Greg Fritz and myself; however, to maintain the required transparency of the process, I suggest the following change to the opening paragraph of Appendix B.1. [NOTE: the clarification sentence draws heavily from C.2.3 which is also mentioned in the introductory to B.1.]

ASTM E.1868-02 "Standard Test Method for Loss-On-Drying by Thermogravimetry" will be used as the guideline for conducting the analysis described in Appendix C.2.3 with the following modifications for this testing program. **This test will generate the data of interest, specifically the temperature at which gasification occurs or more specifically the temperature at which the weight loss reaches a final asymptote. This temperature corresponds to the point at which no further gasification (under the test conditions) occurs and will be considered the temperature for complete gasification of the material. The Loss-On-Drying value has no consequence in this testing scheme.**

Any comments RE: this Proposed Change, please send to me.

Thank you,

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