



Chemicals Americas, Inc.

MR 279922

RECEIVED
OPPT/CIC

OCT 12 AM 11:12

Bayonne Site
229 East 22nd Street
Bayonne, NJ 07002
Telephone: (201)858-8900
Fax: (201) 858-8986

October 8, 2004

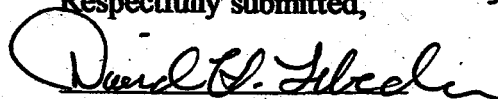
Attn. Dr. Greg Fritz
Document Control Office (7407M)
Office of Pollution Prevention and Toxics (OPPT)
US Environmental Protection Agency
EPA East, Room 6428
1201 Constitution Avenue, NW
Washington, DC. 20460

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2004 OCT 14 AM 8:45

Re: Fluoropolymer Incineration ECA Signature Page

Please find enclosed signature page, Copy # 2-Public Version as required under the enforceable consent agreement (ECA) for the laboratory-scale incineration testing of fluoropolymer chemicals. AGC Chemicals Americas Inc. is not claiming CBI on any fluoropolymer chemicals in this submission; therefore Copy #3 signature page has been excluded.

Respectfully submitted,


David H. Lebedin

CONTAIN NO CBI

XXIV. SIGNATURE

TEST SPONSOR

AGC Chemicals Americas, Inc.^{1, 2}

Company technical contact person for handling correspondence marked as "Confidential"

Name: Noel Misa
 Title: Vice President - Environment, Health and Safety
 Address: 229 East 22nd Street, Bayonne, NJ 07002
 Phone Number: 201-858-8905

ECA Subject Chemicals for AGC Chemicals Americas, Inc.			
Entry	Composite	CAS Registry #	CAS 9CI Name
1	Dry non-melt Fluoropolymer Resin	CAS #9002-84-0	Ethene, tetrafluoro-, homopolymer
2	Dry non-melt Fluoroelastomer Gum	CAS #27029-05-6	1-Propene, polymer with tetrafluoroethene
3	Aqueous Dispersion	CAS #9002-84-0	Ethene, tetrafluoro-, homopolymer

Date: Oct/8/2004



Minoru Kawai
 President
 AGC Chemicals Americas, Inc.
 229 East 22nd Street
 Bayonne, NJ 07002

¹ Data in the table lists the chemical(s) and composite contributions for which AGC Chemicals Americas, Inc. is responsible. The Company developed these data in response to EPA's letter of January 6, 2004.

² AGC Chemicals Americas, Inc. is not obligated under this ECA to perform Phase I PFOA Transport Testing (see Part III. C. and VII.A. of this ECA).

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- (D) Aqueous Fluoropolymer Dispersions Composite #4: (containing:
~~Ethene, tetrafluoro-, polymer with trifluoro(pentafluoroethoxy)-~~
~~ethene, CAS No. 31784-04-0; Ethene, tetrafluoro-, homopolymer,~~
 CAS No. 9002-84-0; 1-Propene, 1,1,2,3,3,3-hexafluoro-, polymer
 with tetrafluoroethene), CAS No. 25067-11-2; Propane,
 1,1,1,2,2,3,3-heptafluoro-3- [(trifluoroethenyl)oxy]-, polymer with
 tetrafluoroethene, CAS No. 26655-00-5; ~~Ethene, tetrafluoro-~~
~~polymer with trifluoro(pentafluoroethoxy)ethene, CAS No.~~
~~31784-04-0; 1-Propene, 1,1,2,3,3,3- hexafluoro-, polymer with~~
 1,1-difluoroethene and tetrafluoroethene, CAS No. 25190-89-0;
 and polytetrafluoroethylene, DCN No. 63040000018C).⁸

wf 10/6/04
 10/8/04
 wf 10/6/04
 10/8/04

The procedure for constructing each composite is described in Appendix A.4. The polymer components for each composite will be unfilled first quality product polymer, substantially free of inorganic constituents. Each component of the four composites to be tested under this ECA will be accompanied by a certificate of analysis showing it to meet applicable product specifications.

III. OBLIGATION OF SIGNATORY COMPANIES

A. The Companies are bound by the terms of this ECA as specified below.

B. Each Company shall be responsible for supplying the test substance(s) it manufactures for incorporation into the composite(s) to be tested under this ECA, as specified on each Company signature page and in Appendix A.3. The schedule for the testing program includes the deadline date by which the Companies must submit their contribution(s) to the facility(ies) that will be assembling the composites to be tested under this ECA. Any Company failing to comply with this ECA requirement will be in violation of this ECA as described in 40 CFR 790.65 (see Part XII of this ECA). In the event that one or more of the Companies are in violation as described above then the remaining Companies will inform EPA of the problem and request an EPA determination on how to proceed with the testing program described under this ECA. Each Company required to contribute to a particular composite is obligated to complete the testing required by this ECA for that composite. A Company shall not be responsible for any failure to perform its obligation under this ECA that is caused by circumstances beyond its control, that the Company could not have prevented through the exercise of due diligence.

⁸ EPA uses a variety of numerical identification systems for tracking chemicals. These include Chemical Abstract Service Registry numbers (CAS) (assigned to non-confidential listed chemicals), pre-manufacture notice (PMN) numbers (assigned by EPA when chemicals enter EPA's new chemical review process, document control numbers (DCN) (assigned by the Confidential Business Information Center for EPA tracking), and Accession (ACC) numbers (provided by EPA when a chemical identity requires protection as TSCA CBI). In addition, Polymer Exemption products will not have a TSCA Inventory ID number but may have a commercial trade identity.

4
 3

to seek judicial review of any rule that may be adopted by EPA that imposes requirements to test any of the fluoropolymer chemicals listed in Appendix A.1 to this ECA.

XXII. RESERVATION OF RIGHTS BY COMPANIES

By signing this ECA, the Companies are not admitting that the requirements of TSCA Section 4 have been satisfied for promulgating a test rule to generate the data required by this ECA.

The Companies contend that the documents generated for the incineration testing program under this ECA are protected from public disclosure under 5 U.S.C. section 552(b)(4) and 15 U.S.C. section 2613(a) and do not constitute studies subject to disclosure under 15 U.S.C. section 2613(b). Accordingly, the public information disclosure provisions of this ECA are, in the view of the Companies, a waiver of legal rights.

XXIII. IDENTITY OF THE COMPANIES AND PRINCIPAL TEST SPONSOR

The Principal Test Sponsor is:

Fluoropolymer Manufacturers Group
Allen Weidman
The Society of the Plastics Industry, Inc.
1801 K Street, N.W., Suite 600K
Washington, DC 20006
202-974-5233

The Companies subject to this ECA are:

AGC Chemicals Americas, Inc.
229 East 22nd Street,
Bayonne, NJ 07002

Dyneon, LLC
6744 33rd Street,
Oakdale, MN 55128

Daikin America, Inc.
20 Olympic Drive,
Orangeburg, NY 10962

E.I. du Pont de Nemours and Company
~~Route 141 and Henry Clay~~ 1007 MARKET STRE
Wilmington, DE ~~19880-0711~~ 19898

wsp 10/6/04

N 10/8/04

14
21

XXIV. SIGNATURE

TEST SPONSOR

E.I. du Pont de Nemours and Company^{1, 2}

Company technical contact person for handling correspondence marked as "Confidential"

Name: David W. Boothe
 Title: Strategic Planning Manager - DuPont Fluoropolymer Products
 Address: ~~Route 141 & Henry Clay, Wilmington, DE 19880-0711~~ 19805
 Phone Number: 302-999-4091

WP 10/6/04
N 10/21/04

Chestnut Run 702
4417 Lancaster Pike

ECA Subject Chemicals for E. I. du Pont de Nemours and Company			
Entry	Composite	CAS Registry #	CAS 9CI Name
1	Dry non-melt Fluoropolymer Resin	CAS #9002-84-0	Ethene, tetrafluoro-, homopolymer
2	Dry melt Fluoropolymer Resin	CAS #25067-11-2	1-Propene, 1,1,2,3,3,3-hexafluoro-, polymer with tetrafluoroethene
3	Dry melt Fluoropolymer Resin	CAS #26655-00-5	Propane, 1,1,1,2,2,3,3-heptafluoro-3-(trifluoroethenyl)oxy]-, polymer with tetrafluoroethene
4	Dry melt Fluoropolymer Resin	CAS #31784-04-0	Ethene, tetrafluoro-, polymer with trifluoro(pentafluoroethoxy)ethene
5	Aqueous Dispersion	CAS #9002-84-0	Ethene, tetrafluoro-, homopolymer
6	Aqueous Dispersion	CAS #25067-11-2	1-Propene, 1,1,2,3,3,3-hexafluoro-, polymer with tetrafluoroethene
7	Aqueous Dispersion	CAS #26655-00-5	Propane, 1,1,1,2,2,3,3-heptafluoro-3-(trifluoroethenyl)oxy]-, polymer with tetrafluoroethene

¹ Data in the table lists the chemical(s) and composite contributions for which E.I. du Pont de Nemours and Company is responsible. The Company developed these data in response to EPA's letter of January 6, 2004.

² E.I. du Pont de Nemours and Company is not obligated under this ECA to perform Phase I PFOA Transport Testing (see Part III. C. and VII.A. of this ECA).

XXIV. SIGNATURE

**TEST SPONSOR
Dyneon, LLC ^{1, 2}**

Company technical contact person for handling correspondence marked as "Confidential"

Name: George H. Millet
 Title: Director, Quality, Environment, Health and Safety
 Address: 6744 33rd Street, Oakdale, MN 55128
 Phone Number: 651-733-5637

ECA Subject Chemicals for Dyneon, LLC *			
Entry	Composite	CAS Registry #	CAS 9CI Name
1	Dry non-melt Fluoropolymer Resin	CAS #9002-84-0	Ethene, tetrafluoro-, homopolymer
2	Dry non-melt Fluoropolymer Resin	CAS #26655-00-5	Propane, 1,1,1,2,2,3,3-heptafluoro-3-[(trifluoroethenyl)oxy]-, polymer with tetrafluoroethene
3	Dry melt Fluoropolymer Resin	CAS #25067-11-2	1-Propene, 1,1,2,3,3,3-hexafluoro-, polymer with tetrafluoroethene
4	Dry melt Fluoropolymer Resin	CAS #26655-00-5	Propane, 1,1,1,2,2,3,3-heptafluoro-3-[(trifluoroethenyl)oxy]-, polymer with tetrafluoroethene
5	Dry melt Fluoropolymer Resin	CAS #25190-89-0	1-Propene, 1,1,2,3,3,3-hexafluoro-, polymer with 1,1-difluoroethene and tetrafluoroethene
6	Dry melt Fluoropolymer Resin		

WR 10/6/04
- J
10/8/04

WR 10/6/04
- J
10/8/04

¹ Data in the table lists the chemical(s) and composite contributions for which Dyneon, LLC is responsible. The Company developed these data in response to EPA's letter of January 6, 2004. There is both a Public and CBI version of this page because the Company has asserted that data in this table are considered by them to be entitled to treatment as TSCA confidential business information (CBI) (see Part XIV. D. of this ECA regarding confidentiality of information).

² Dyneon, LLC is obligated under this ECA to perform Phase I PFOA Transport Testing (see Part III. C. and VII.A. of this ECA).

Continued: ECA Subject Chemicals for Dyneon, LLC

Entry	Composite	CAS Registry #	CAS 9CI Name
7	Dry melt Fluoropolymer Resin	CAS #35560-16-8	1-Propene, 1,1,2,3,3,3-hexafluoro-, polymer with ethene and tetrafluoroethene
8	Dry non-melt Fluoroelastomer Gum	CAS #27029-05-6	1-Propene, polymer with tetrafluoroethene
9	Dry non-melt Fluoroelastomer Gum	CAS #54675-89-7	1-Propene, polymer with 1,1-difluoroethene and tetrafluoroethene
10	Dry non-melt Fluoroelastomer Gum	CAS #26425-79-6	Ethene, tetrafluoro-, polymer with trifluoro(trifluoromethoxy) ethene
11	Dry non-melt Fluoroelastomer Gum	CAS #9010-75-7	Ethene, chlorotrifluoro-, polymer with 1,1-difluoroethene
12	Dry non-melt Fluoroelastomer Gum	X	X
13	Aqueous Dispersion	CAS #9002-84-0	Ethene, tetrafluoro-, homopolymer
14	Aqueous Dispersion	CAS #25067-11-2	1-Propene, 1,1,2,3,3,3-hexafluoro-, polymer with tetrafluoroethene
15	Aqueous Dispersion	CAS #26655-00-5	Propane, 1,1,1,2,2,3,3-heptafluoro-3-[(trifluoroethenyl)oxy]-, polymer with tetrafluoroethene
16	Aqueous Dispersion	CAS #25190-89-0	1-Propene, 1,1,2,3,3,3-hexafluoro-, polymer with 1,1-difluoroethene and tetrafluoroethene

*wp 10/6/02
- 10/8/04*

*wp 10/6/02
- 10/8/04*

* Entries "X'd" out indicate redacted information claimed as CBI by the Company.

APPENDIX A.3
COMPOSITION OF COMPOSITES TO BE TESTED

The four composite test substances for this test program are presented below in Table A.3-1 with the fluoropolymer types, CAS numbers, and associated monomers for these fluoropolymers. Each fluoropolymer used in each relevant test substance composite will have been made using APFO.

Table A.3-1. Test Substance Composites by Type

Test Substance	Fluoropolymer Type	CAS Number	Associated Monomers
Composite 1 - Dry non-melt resin	PTFE	9002-84-0	TFE
	Modified PTFE	26655-00-5	TFE, PFVE
Composite 2 - Dry melt resins	FEP	25067-11-2	TFE, HFP
	PFA	26655-00-5	TFE, PFVE
		31784-04-0	TFE, PEVE
	THV	25190-89-0	TFE, HFP, VDF
	ETFE	68258-85-5	TFE, E
Composite 3 - Fluoroelastomers	Fluoroelastomer Copolymers	9011-17-0	VDF, HFP
		25190-89-0	TFE, HFP, VDF
	Base resistant elastomers	54675-89-7,	TFE, VDF, P
		27029-05-6	TFE, P
	Perfluoroelastomers	26425-79-6	TFE, PMVE
	CTFE elastomers	9010-75-7	CTFE, VDF
	Low temperature elastomers	CBI	TFE, VDF
Composite 4 - Aqueous Dispersions	PTFE	9002-84-0	TFE
	FEP	25067-11-2	TFE, HFP
	PFA	26655-00-5	TFE, PFVE
		31784-04-0	TFE, PEVE
THV	25190-89-0	TFE, HFP, VDF	

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- J 12/15/04

Confidential business information (CBI) regarding the chemical identity of low temperature elastomers has been submitted to EPA under separate cover.

~~A.3-1~~

4.2.2 Composite 2

~~FEP, PFA~~ ~~ETFE~~
~~FEP, PFA, THV, ETEE,~~ and HTE dry melt resins are available in powder form. Equal weights of the powder form of each component (following the approach in the example for Composite Z in Section 4.1 above) will be mixed together in dry form to yield Composite 2.

*Conf 10/6/06
7/10/04*

4.2.3 Composite 3

Fluoroelastomers are available in slab, lump, or sheet form. Composite 3 will be prepared following one of the following approaches:

- a) Equal weights of each component (following the approach in example for Composite Z in Section 4.1) will be mixed on a rubber mill to produce a homogenous slab of preset thickness to yield Composite 3.

Or

- b) Each component of Composite 3 will be cryogenically cooled (to make the elastomers brittle) and size-reduced (e.g., ground) to produce powder. Equal weights of the powder form of each component (following the approach in the example for Composite Z in Section 4.1) will be mixed together in dry form to yield Composite 3.

4.2.4 Composite 4

Aqueous dispersions of PTFE, FEP, PFA, and THV are available as dispersions containing 20 to 60% fluoropolymer solids by weight. Composite 4 will be prepared following one of the following approaches:

- a) Equal weights (on a dry solids basis) of each component in aqueous dispersion form (following the approach in example for Composite Z in Section 4.1) will be mixed together in liquid form. Solids will be separated from the resulting liquid composite to yield low water content (i.e., drip free) fine solids.

Or

- b) Solids will be separated from liquid for each component of Composite 4 to yield low water content (i.e., drip free) fine solids for each component. Equal weights of the solids form of each component (following the approach in the example for Composite Z in Section 4.1) will be mixed together to yield Composite 4.

MR 279929

OPPT-2003-0012-0744

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OPPT-0012

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October 11, 2004

Dr. Greg Fritz
Document Control Office (7407M)
Office of Pollution Prevention and Toxics (OPPT)
US Environmental Protection Agency
EPA East, Room 6428
1201 Constitution Avenue, NW
Washington, DC 20460
Telephone: 202-564-8930

COMPANY SANITIZED

OPPT-2003-0012

Re: **Fluoropolymer Incineration ECA Signature Materials – Docket Number
OPPT-2003-0012**

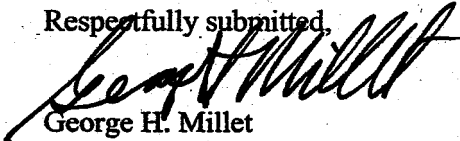
Dear Dr. Fritz:

As we reviewed Copy #5 of the Incineration ECA signature pages, we found two additional errors on page 21, the table of ECA Subject Chemicals for Dyneon, LLC. These were in Rows 6 and 12, in the Generic Identification number column. In both cases, the Generic identification numbers were listed. In order to have positive identification of the chemicals in those rows of the table the appropriate CAS # was written in, and the generic number was lined out.

The two changes were both signed by William Myers, as were all of the other changes in this Copy and in Copy #2, the public version of the signature materials. Would you please have Ward Penberthy initial the two additional changes.

If you have any questions regarding the information contained in this letter, please contact me at 651-733-5637.

Respectfully submitted,



George H. Millet
Director, Quality, Environmental, Health and Safety
Dyneon LLC



6 3 0 5 0 0 0 0 0 0 1 7 5

1

- (D) Aqueous Fluoropolymer Dispersions Composite #4: (containing:
~~Ethene, tetrafluoro-, polymer with trifluoro(pentafluoroethoxy)-~~
~~ethene, CAS No. 31784-04-0;~~ Ethene, tetrafluoro-, homopolymer,
 CAS No. 9002-84-0; 1-Propene, 1,1,2,3,3,3-hexafluoro-, polymer
 with tetrafluoroethene), CAS No. 25067-11-2; Propane,
 1,1,1,2,2,3,3-heptafluoro-3- [(trifluoroethenyl)oxy]-, polymer with
 tetrafluoroethene, CAS No. 26655-00-5; ~~Ethene, tetrafluoro-,~~
~~polymer with trifluoro(pentafluoroethoxy)ethene, CAS No.~~
~~31784-04-0;~~ 1-Propene, 1,1,2,3,3,3- hexafluoro-, polymer with
 1,1-difluoroethene and tetrafluoroethene, CAS No. 25190-89-0;
 and polytetrafluoroethylene, DCN No. 63040000018C).⁸

WFB 10/6/04
William Myers 10/11/04

WFB 10/6/04
William Myers 10/11/04

The procedure for constructing each composite is described in Appendix A.4. The polymer components for each composite will be unfilled first quality product polymer, substantially free of inorganic constituents. Each component of the four composites to be tested under this ECA will be accompanied by a certificate of analysis showing it to meet applicable product specifications.

III. OBLIGATION OF SIGNATORY COMPANIES

A. The Companies are bound by the terms of this ECA as specified below.

B. Each Company shall be responsible for supplying the test substance(s) it manufactures for incorporation into the composite(s) to be tested under this ECA, as specified on each Company signature page and in Appendix A.3. The schedule for the testing program includes the deadline date by which the Companies must submit their contribution(s) to the facility(ies) that will be assembling the composites to be tested under this ECA. Any Company failing to comply with this ECA requirement will be in violation of this ECA as described in 40 CFR 790.65 (see Part XII of this ECA). In the event that one or more of the Companies are in violation as described above then the remaining Companies will inform EPA of the problem and request an EPA determination on how to proceed with the testing program described under this ECA. Each Company required to contribute to a particular composite is obligated to complete the testing required by this ECA for that composite. A Company shall not be responsible for any failure to perform its obligation under this ECA that is caused by circumstances beyond its control, that the Company could not have prevented through the exercise of due diligence.

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to seek judicial review of any rule that may be adopted by EPA that imposes requirements to test any of the fluoropolymer chemicals listed in Appendix A.1 to this ECA.

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The Companies contend that the documents generated for the incineration testing program under this ECA are protected from public disclosure under 5 U.S.C. section 552(b)(4) and 15 U.S.C. section 2613(a) and do not constitute studies subject to disclosure under 15 U.S.C. section 2613(b). Accordingly, the public information disclosure provisions of this ECA are, in the view of the Companies, a waiver of legal rights.

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Allen Weidman
The Society of the Plastics Industry, Inc.
1801 K Street, N.W., Suite 600K
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202-974-5233

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Daikin America, Inc.
20 Olympic Drive,
Orangeburg, NY 10962

E.I. du Pont de Nemours and Company
~~Route 141 and Henry Clay~~ 1007 MARKET STREET
Wilmington, DE ~~19880-0711~~ 19898

*wp 10/6/04
William Myron 10/6/04*

XXIV. SIGNATURE

TEST SPONSOR

E.I. du Pont de Nemours and Company^{1, 2}

Company technical contact person for handling correspondence marked as "Confidential"

Name: David W. Boothe
 Title: Strategic Planning Manager - DuPont Fluorosolutions
 Address: ~~Route 141 & Henry Clay, Wilmington, DE 19880-0711~~ 19805
 Phone Number: 302-999-4091
Products
William Meyer 10/16/04
4417 Lancaster Pike
Chestnut Run 702

ECA Subject Chemicals for E. I. du Pont de Nemours and Company			
Entry	Composite	CAS Registry #	CAS 9CI Name
1	Dry non-melt Fluoropolymer Resin	CAS #9002-84-0	Ethene, tetrafluoro-, homopolymer
2	Dry melt Fluoropolymer Resin	CAS #25067-11-2	1-Propene, 1,1,2,3,3,3-hexafluoro-, polymer with tetrafluoroethene
3	Dry melt Fluoropolymer Resin	CAS #26655-00-5	Propane, 1,1,1,2,2,3,3-heptafluoro-3-(trifluoroethenyl)oxy]-, polymer with tetrafluoroethene
4	Dry melt Fluoropolymer Resin	CAS #31784-04-0	Ethene, tetrafluoro-, polymer with trifluoro(pentafluoroethoxy)ethene
5	Aqueous Dispersion	CAS #9002-84-0	Ethene, tetrafluoro-, homopolymer
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¹ Data in the table lists the chemical(s) and composite contributions for which E.I. du Pont de Nemours and Company is responsible. The Company developed these data in response to EPA's letter of January 6, 2004.

² E.I. du Pont de Nemours and Company is not obligated under this ECA to perform Phase I PFOA Transport Testing (see Part III. C. and VII.A. of this ECA).

XXIV. SIGNATURE

TEST SPONSOR
Dyneon, LLC ^{1, 2}

Company technical contact person for handling correspondence marked as "Confidential"

Name: George H. Millet
 Title: Director, Quality, Environment, Health and Safety
 Address: 6744 33rd Street, Oakdale, MN 55128
 Phone Number: 651-733-5637

ECA Subject Chemicals for Dyneon, LLC *			
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4	Dry melt Fluoropolymer Resin	CAS #26655-00-5	Propane, 1,1,1,2,2,3,3-heptafluoro-3-[(trifluoroethenyl)oxy]-, polymer with tetrafluoroethene
5	Dry melt Fluoropolymer Resin	CAS #25190-89-0	1-Propene, 1,1,2,3,3,3-hexafluoro-, polymer with 1,1-difluoroethene and tetrafluoroethene
6	Dry melt Fluoropolymer Resin	X	X

*WSP 10/6/04
William Millet
10/11/04*

*WSP 10/6/04
William Millet
10/11/04*

¹ Data in the table lists the chemical(s) and composite contributions for which Dyneon, LLC is responsible. The Company developed these data in response to EPA's letter of January 6, 2004. There is both a Public and CBI version of this page because the Company has asserted that data in this table are considered by them to be entitled to treatment as TSCA confidential business information (CBI) (see Part XIV. D. of this ECA regarding confidentiality of information).

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Continued: ECA Subject Chemicals for Dyneon, LLC			
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9	Dry non-melt Fluoroelastomer Gum	CAS #54675-89-7	1-Propene, polymer with 1,1-difluoroethene and tetrafluoroethene
10	Dry non-melt Fluoroelastomer Gum	CAS #26425-79-6	Ethene, tetrafluoro-, polymer with trifluoro(trifluoromethoxy) ethene
11	Dry non-melt Fluoroelastomer Gum	CAS #9010-75-7	Ethene, chlorotrifluoro-, polymer with 1,1-difluoroethene
12	Dry non-melt Fluoroelastomer Gum		
13	Aqueous Dispersion	CAS #9002-84-0	Ethene, tetrafluoro-, homopolymer
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* Entries "X'd" out indicate redacted information claimed as CBI by the Company.			

w/p 10/6/04

William Myer
10/11/04

w/p 10/6/04

William Myer
10/11/04

APPENDIX A.3
COMPOSITION OF COMPOSITES TO BE TESTED

The four composite test substances for this test program are presented below in Table A.3-1 with the fluoropolymer types, CAS numbers, and associated monomers for these fluoropolymers. Each fluoropolymer used in each relevant test substance composite will have been made using APFO.

Table A.3-1. Test Substance Composites by Type

Test Substance	Fluoropolymer Type	CAS Number	Associated Monomers
Composite 1 - Dry non-melt resin	PTFE	9002-84-0	TFE
	Modified PTFE	26655-00-5	TFE, PPVE
Composite 2 - Dry melt resins	FEP	25067-11-2	TFE, HFP
	PFA	26655-00-5	TFE, PPVE
		31784-04-0	TFE, PEVE
	THV	25190-89-0	TFE, HFP, VDF
	ETFE	68258-85-5	TFE, E
Composite 3 - Fluoroelastomers	Fluoroelastomer Copolymers	9011-17-0	VDF, HFP
		25190-89-0	TFE, HFP, VDF
	Base resistant elastomers	54675-89-7,	TFE, VDF, P
		27029-05-6	TFE, P
	Perfluoroelastomers	26425-79-6	TFE, PMVE
	CTFE elastomers	9010-75-7	CTFE, VDF
	Low temperature elastomers	CBI	TFE, VDF
Composite 4 - Aqueous Dispersions	PTFE	9002-84-0	TFE
	FEP	25067-11-2	TFE, HFP
	PFA	26655-00-5	TFE, PPVE
		31784-04-0	TFE, PEVE
THV	25190-89-0	TFE, HFP, VDF	

WMP 10/6/04
William Myers
10/11/04

Confidential business information (CBI) regarding the chemical identity of low temperature elastomers has been submitted to EPA under separate cover.

4.2.2 Composite 2

*William Myer
WRP 10/6/0*

~~FEP, PFA~~ ~~ETFE~~
~~FEP, PFA, THV, ETFE~~, and HTE dry melt resins are available in powder form. Equal weights of the powder form of each component (following the approach in the example for Composite Z in Section 4.1 above) will be mixed together in dry form to yield Composite 2.

4.2.3 Composite 3

Fluoroelastomers are available in slab, lump, or sheet form. Composite 3 will be prepared following one of the following approaches:

- a) Equal weights of each component (following the approach in example for Composite Z in Section 4.1) will be mixed on a rubber mill to produce a homogenous slab of preset thickness to yield Composite 3.

Or

- b) Each component of Composite 3 will be cryogenically cooled (to make the elastomers brittle) and size-reduced (e.g., ground) to produce powder. Equal weights of the powder form of each component (following the approach in the example for Composite Z in Section 4.1) will be mixed together in dry form to yield Composite 3.

4.2.4 Composite 4

Aqueous dispersions of PTFE, FEP, PFA, and THV are available as dispersions containing 20 to 60% fluoropolymer solids by weight. Composite 4 will be prepared following one of the following approaches:

- a) Equal weights (on a dry solids basis) of each component in aqueous dispersion form (following the approach in example for Composite Z in Section 4.1) will be mixed together in liquid form. Solids will be separated from the resulting liquid composite to yield low water content (i.e., drip free) fine solids.

Or

- b) Solids will be separated from liquid for each component of Composite 4 to yield low water content (i.e., drip free) fine solids for each component. Equal weights of the solids form of each component (following the approach in the example for Composite Z in Section 4.1) will be mixed together to yield Composite 4.

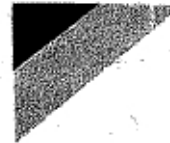
continued: Dyneon, LLC.

Date: 10/11/04

William Myers

William R. Myers
President
Dyneon, LLC
6744 33rd Street
Oakdale, MN 55128

DAIKIN



DAIKIN AMERICA, INC.

20 Olympic Drive
Orangeburg, NY 10962
Tel: (845) 365-9500
Fax: (845) 365-9515

RECEIVED

OCT 14 AM 7:13

October 13, 2004

Wardner G. Penberthy
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

OPPT-2003-0012-0775

NOTIFIED

Dear Mr. Penberthy:

In response to your letter of August 16, 2004, I am providing signed copies of the signature pages for the Enforceable Consent Agreement (ECA) for incineration testing of fluoropolymer-based polymers. Daikin America is agreeing to the terms of the ECA as recorded in the "public version" of the document (ECA Copy #2) with certain modifications. Specifically EPA has made modifications to the text of the ECA by letter of September 9, 2004 and October 6, 2004. In addition, Daikin notes one additional modification that it has communicated to the negotiation team on the ECA but that has not yet been made in the text of the ECA. On page 4 of the Public Version of the ECA, the description of the "Aqueous Fluoropolymer Dispersion Composite #4" is incorrect. In the last line of the description, the DCN number should be DCN No. 63040000018B. Provided that all of these modifications are made to the document text, Daikin consents to the terms of the ECA.

In Section XV of this ECA, EPA has stipulated that any confidential business information (CBI) produced in the course of this ECA will be provided to other federal agencies only in accord with the OPPTS TSCA CBI Protection Manual. Based on a review of this Manual, the signatories to this ECA were initially uncertain about whether EPA would hold other agencies to all substantive and procedural aspects of the EPA requirements for protection of CBI.

In a letter dated February 3, 2004, EPA's Office of General Counsel has provided an assurance that another federal agency receiving "off-site" access to CBI information generated in the course of this ECA must satisfy all aspects of the Manual and EPA's regulations, both substantive and procedural. EPA informs us that this letter is Document OPPT-2003-0012-0712 in the ECA Docket. With this understanding, Daikin America has agreed to sign this ECA.

Daikin will continue to work with EPA, in the context of the ECA process or parallel information collection processes, to obtain a better understanding about PFOA in the environment. Thank you for your cooperation in the development of this ECA.

Sincerely yours,



6 3 0 5 0 0 0 0 0 0 2 1 3

280017



Satoshi Doi
President
Daikin America, Inc.
20 Olympic Drive
Orangeburg, NY 10962

XXIV. SIGNATURE

TEST SPONSOR 7:13

Daikin America, Inc.^{1, 2}

Company technical contact person for handling correspondence marked as "Confidential"

Name: Takayuki Nakamura
Title: Senior Market Development Specialist
Address: Umeda Center Building, 22F
2-4-12 Nakazaki-Nishi,
Kita, Osaka, 530-8323, Japan
Phone Number: 81-6-6373-4349

ECA Subject Chemicals for Daikin America, Inc. *			
Entry	Composite	CAS Registry #	CAS 9CI Name
1	Dry non-melt Fluoropolymer Resin		
2	Aqueous Dispersion		
3	Dry non-melt Fluoroelastomer Gum		
4	Dry non-melt Fluoroelastomer Gum		

* Entries "X'd" out indicate redacted information claimed as CBI by the Company.

¹ Data in the table lists the chemical(s) and composite contributions for which Daikin America, Inc. is responsible. The Company developed these data in response to EPA's letter of January 6, 2004. There is both a Public and CBI version of this page because the Company has asserted that data in this table are considered by them to be entitled to treatment as TSCA confidential business information (CBI) (see Part XIV. D. of this ECA regarding confidentiality of information).

² Daikin America, Inc. is not obligated under this ECA to perform Phase I PFOA Transport Testing (see Part III. C. and VII.A. of this ECA).

continued: Daikin America, Inc.

ECA Subject Chemicals for Daikin America, Inc.			
Entry	Composite	Generic ID †	Generic Name
1	Dry non-melt Fluoropolymer Resin	DCN # 63040000018A	Polytetrafluoroethylene
2	Aqueous Dispersion	DCN # 63040000018B	Polytetrafluoroethylene
3	Dry non-melt Fluoroelastomer Gum	DCN # 63040000018C	Fluoroelastomer
4	Dry non-melt Fluoroelastomer Gum	DCN # 63040000018D	Fluoroelastomer
† The CBI protected CAS Registry numbers have been substituted with Document Control Numbers (DCN) for the Company claimed CBI information held by the EPA. The DCN is assigned by EPA to a company claimed CBI submission that is tracked by the Confidential Business Information Center (CBIC); the terminating letter indicates which substance is being referenced.			

Date: Oct. 04, '04Satoshi Doi

Satoshi Doi
 President
 Daikin America, Inc.
 20 Olympic Drive
 Orangeburg, NY 10962

OPPT-2003-0012-0776

DuPont
Chestnut Run Plaza
P. O. Box 80713
Wilmington, DE 19880-0713



RECEIVED

OCT 22 11 11 AM '04

October 21, 2004

OPPT-2003-0012

Document Control Office (7407M)
U.S. Environmental Protection Agency
Office of Pollution Prevention and Toxics (OPPT)
EPA East, Room 6428
1201 Constitution Avenue, NW
Washington, DC 20460

Attn: Dr. Greg Fritz

Re: Signature of Fluoropolymer Incineration ECA

Dear Greg Fritz:

We are pleased to return the signed and initialed pages of the "ECA for the Laboratory-Scale Incineration Testing of Fluoropolymers". This was requested by the EPA in a letter of August 16, 2004 (Ward Penberthy) and subsequent corrections of September 9, 2004 (Richard Leukroth) and October 5, 2004 (Ward Penberthy).

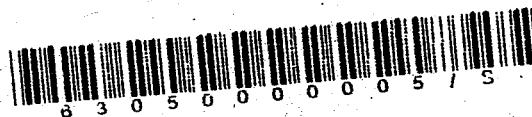
DuPont looks forward to the completion of the signature process by the EPA, and transmittal of the final signed agreement. If you have any questions regarding this letter, please contact me at 302-999-4658.

Sincerely,

L. William Buxton
Regulatory Affairs
DuPont Fluoroproducts

LWB/sth
Enclosure

CC: Francine C. Shaw (w/o Encl.)
David W. Boothe (w/o Encl.)



280235

XXIV. SIGNATURE

TEST SPONSOR

E.I. du Pont de Nemours and Company^{1, 2}

Company technical contact person for handling correspondence marked as "Confidential"

Name: David W. Boothe
 Title: Strategic Planning Manager - DuPont Fluorosolutions
 Address: Route 141 & Henry Clay, Wilmington, DE 19880-0711
 Phone Number: 302-999-4091

ECA Subject Chemicals for E. I. du Pont de Nemours and Company			
Entry	Composite	CAS Registry #	CAS 9CI Name
1	Dry non-melt Fluoropolymer Resin	CAS #9002-84-0	Ethene, tetrafluoro-, homopolymer
2	Dry melt Fluoropolymer Resin	CAS #25067-11-2	1-Propene, 1,1,2,3,3,3-hexafluoro-, polymer with tetrafluoroethene
3	Dry melt Fluoropolymer Resin	CAS #26655-00-5	Propane, 1,1,1,2,2,3,3-heptafluoro-3- (trifluoroethenyl)oxy]-, polymer with tetrafluoroethene
4	Dry melt Fluoropolymer Resin	CAS #31784-04-0	Ethene, tetrafluoro-, polymer with trifluoro(pentafluoroethoxy)ethene
5	Aqueous Dispersion	CAS #9002-84-0	Ethene, tetrafluoro-, homopolymer
6	Aqueous Dispersion	CAS #25067-11-2	1-Propene, 1,1,2,3,3,3-hexafluoro-, polymer with tetrafluoroethene
7	Aqueous Dispersion	CAS #26655-00-5	Propane, 1,1,1,2,2,3,3-heptafluoro-3- (trifluoroethenyl)oxy]-, polymer with tetrafluoroethene

¹ Data in the table lists the chemical(s) and composite contributions for which E.I. du Pont de Nemours and Company is responsible. The Company developed these data in response to EPA's letter of January 6, 2004.

² E.I. du Pont de Nemours and Company is not obligated under this ECA to perform Phase I PFOA Transport Testing (see Part III. C. and VII.A. of this ECA).

continued: E.I. du Pont de Nemours and Company

Date: 10-19-04



Francine C. Shaw
Vice President -- Dupont Corporate Operations
E.I. du Pont de Nemours and Company
1007 Market Street
D-9042
Wilmington, DE 19898

XXIV. SIGNATURE

TEST SPONSOR
Dyneon, LLC^{1, 2}

Company technical contact person for handling correspondence marked as "Confidential"

Name: George H. Millet
 Title: Director, Quality, Environment, Health and Safety
 Address: 6744 33rd Street, Oakdale, MN 55128
 Phone Number: 651-733-5637

ECA Subject Chemicals for Dyneon, LLC *			
Entry	Composite	CAS Registry #	CAS 9CI Name
1	Dry non-melt Fluoropolymer Resin	CAS #9002-84-0	Ethene, tetrafluoro-, homopolymer
2	Dry non-melt Fluoropolymer Resin	CAS #26655-00-5	Propane, 1,1,1,2,2,3,3-heptafluoro-3-[(trifluoroethyl)oxy]-, polymer with tetrafluoroethene
3	Dry melt Fluoropolymer Resin	CAS #25067-11-2	1-Propene, 1,1,2,3,3,3-hexafluoro-, polymer with tetrafluoroethene
4	Dry melt Fluoropolymer Resin	CAS #26655-00-5	Propane, 1,1,1,2,2,3,3-heptafluoro-3-[(trifluoroethyl)oxy]-, polymer with tetrafluoroethene
5	Dry melt Fluoropolymer Resin	CAS #25190-89-0	1-Propene, 1,1,2,3,3,3-hexafluoro-, polymer with 1,1-difluoroethene and tetrafluoroethene
6	Dry melt Fluoropolymer Resin		

*WSP 10/16/0
 JS 10/19/0*

*WSP 10/16/0
 JS 10/19/0*

¹ Data in the table lists the chemical(s) and composite contributions for which Dyneon, LLC is responsible. The Company developed these data in response to EPA's letter of January 6, 2004. There is both a Public and CBI version of this page because the Company has asserted that data in this table are considered by them to be entitled to treatment as TSCA confidential business information (CBI) (see Part XIV. D. of this ECA regarding confidentiality of information).

² Dyneon, LLC is obligated under this ECA to perform Phase I PFOA Transport Testing (see Part III. C. and VII.A. of this ECA).

Continued: ECA Subject Chemicals for Dyneon, LLC			
Entry	Composite	CAS Registry #	CAS 9CI Name
7	Dry melt Fluoropolymer Resin	CAS #35560-16-8	1-Propene, 1,1,2,3,3,3-hexafluoro-, polymer with ethene and tetrafluoroethene
8	Dry non-melt Fluoroelastomer Gum	CAS #27029-05-6	1-Propene, polymer with tetrafluoroethene
9	Dry non-melt Fluoroelastomer Gum	CAS #54675-89-7	1-Propene, polymer with 1,1- difluoroethene and tetrafluoroethene
10	Dry non-melt Fluoroelastomer Gum	CAS #26425-79-6	Ethene, tetrafluoro-, polymer with trifluoro(trifluoromethoxy) ethene
11	Dry non-melt Fluoroelastomer Gum	CAS #9010-75-7	Ethene, chlorotrifluoro-, polymer with 1,1- difluoroethene
12	Dry non-melt Fluoroelastomer Gum	X	X
13	Aqueous Dispersion	CAS #9002-84-0	Ethene, tetrafluoro-, homopolymer
14	Aqueous Dispersion	CAS #25067-11-2	1-Propene, 1,1,2,3,3,3-hexafluoro-, polymer with tetrafluoroethene
15	Aqueous Dispersion	CAS #26655-00-5	Propane, 1,1,1,2,2,3,3-heptafluoro-3- [[trifluoroethenyl]oxy]-, polymer with tetrafluoroethene
16	Aqueous Dispersion	CAS #25190-89-0	1-Propene, 1,1,2,3,3,3-hexafluoro-, polymer with 1,1-difluoroethene and tetrafluoroethene
* Entries "X'd" out indicate redacted information claimed as CBI by the Company.			

WSP 10/6/02
DS 10/19/04

WSP 10/6/02
DS 10/19/04

- (D) Aqueous Fluoropolymer Dispersions Composite #4: (containing:
~~Ethene, tetrafluoro-, polymer with trifluoro(pentafluoroethoxy)-~~
~~ethene, CAS No. 31784-04-0;~~ Ethene, tetrafluoro-, homopolymer,
 CAS No. 9002-84-0; 1-Propene, 1,1,2,3,3,3-hexafluoro-, polymer
 with tetrafluoroethene), CAS No. 25067-11-2; Propane,
 1,1,1,2,2,3,3-heptafluoro-3- [(trifluoroethenyl)oxy]-, polymer with
 tetrafluoroethene, CAS No. 26655-00-5; ~~Ethene, tetrafluoro-~~
~~polymer with trifluoro(pentafluoroethoxy)ethene, CAS No.~~
~~31784-04-0;~~ 1-Propene, 1,1,2,3,3,3- hexafluoro-, polymer with
 1,1-difluoroethene and tetrafluoroethene, CAS No. 25190-89-0;
 and polytetrafluoroethylene, DCN No. 63040000018C).⁸

wrf 10/6/04

JS 10/17/04

wrf 10/6/04

JS 10/19/04

The procedure for constructing each composite is described in Appendix A.4. The polymer components for each composite will be unfilled first quality product polymer, substantially free of inorganic constituents. Each component of the four composites to be tested under this ECA will be accompanied by a certificate of analysis showing it to meet applicable product specifications.

III. OBLIGATION OF SIGNATORY COMPANIES

A. The Companies are bound by the terms of this ECA as specified below.

B. Each Company shall be responsible for supplying the test substance(s) it manufactures for incorporation into the composite(s) to be tested under this ECA, as specified on each Company signature page and in Appendix A.3. The schedule for the testing program includes the deadline date by which the Companies must submit their contribution(s) to the facility(ies) that will be assembling the composites to be tested under this ECA. Any Company failing to comply with this ECA requirement will be in violation of this ECA as described in 40 CFR 790.65 (see Part XII of this ECA). In the event that one or more of the Companies are in violation as described above then the remaining Companies will inform EPA of the problem and request an EPA determination on how to proceed with the testing program described under this ECA. Each Company required to contribute to a particular composite is obligated to complete the testing required by this ECA for that composite. A Company shall not be responsible for any failure to perform its obligation under this ECA that is caused by circumstances beyond its control, that the Company could not have prevented through the exercise of due diligence.

⁸ EPA uses a variety of numerical identification systems for tracking chemicals. These include Chemical Abstract Service Registry numbers (CAS) (assigned to non-confidential listed chemicals), pre-manufacture notice (PMN) numbers (assigned by EPA when chemicals enter EPA's new chemical review process, document control numbers (DCN) (assigned by the Confidential Business Information Center for EPA tracking), and Accession (ACC) numbers (provided by EPA when a chemical identity requires protection as TSCA CBI). In addition, Polymer Exemption products will not have a TSCA Inventory ID number but may have a commercial trade identity.

to seek judicial review of any rule that may be adopted by EPA that imposes requirements to test any of the fluoropolymer chemicals listed in Appendix A.1 to this ECA.

XXII. RESERVATION OF RIGHTS BY COMPANIES

By signing this ECA, the Companies are not admitting that the requirements of TSCA Section 4 have been satisfied for promulgating a test rule to generate the data required by this ECA.

The Companies contend that the documents generated for the incineration testing program under this ECA are protected from public disclosure under 5 U.S.C. section 552(b)(4) and 15 U.S.C. section 2613(a) and do not constitute studies subject to disclosure under 15 U.S.C. section 2613(b). Accordingly, the public information disclosure provisions of this ECA are, in the view of the Companies, a waiver of legal rights.

XXIII. IDENTITY OF THE COMPANIES AND PRINCIPAL TEST SPONSOR

The Principal Test Sponsor is:

Fluoropolymer Manufacturers Group
Allen Weidman
The Society of the Plastics Industry, Inc.
1801 K Street, N.W., Suite 600K
Washington, DC 20006
202-974-5233

The Companies subject to this ECA are:

AGC Chemicals Americas, Inc.
229 East 22nd Street,
Bayonne, NJ 07002

Dyneon, LLC
6744 33rd Street,
Oakdale, MN 55128

Daikin America, Inc.
20 Olympic Drive,
Orangeburg, NY 10962

E.I. du Pont de Nemours and Company
~~Route 141 and Henry Clay~~ 1007 MARKET STREET
Wilmington, DE ~~19880-0711~~ 19898

not 10/6/04
ES 10/19/04

APPENDIX A.3
COMPOSITION OF COMPOSITES TO BE TESTED

The four composite test substances for this test program are presented below in Table A.3-1 with the fluoropolymer types, CAS numbers, and associated monomers for these fluoropolymers. Each fluoropolymer used in each relevant test substance composite will have been made using APFO.

Table A.3-1. Test Substance Composites by Type

Test Substance	Fluoropolymer Type	CAS Number	Associated Monomers
Composite 1 - Dry non-melt resin	PTFE	9002-84-0	TFE
	Modified PTFE	26655-00-5	TFE, PFVE
Composite 2 - Dry melt resins	FEP	25067-11-2	TFE, HFP
	PFA	26655-00-5	TFE, PFVE
		31784-04-0	TFE, PEVE
	THV	25190-89-0	TFE, HFP, VDF
	ETFE	68256-85-5	TFE, E
	HTE	35560-16-8	TFE, HFP, E
Composite 3 - Fluoroelastomers	Fluoroelastomer Copolymers	9011-17-0	VDF, HFP
	Fluoroelastomer Terpolymers	25190-89-0	TFE, HFP, VDF
	Base resistant elastomers	54675-89-7, 27029-05-6	TFE, VDF, P TFE, P
	Perfluoroelastomers	26425-79-6	TFE, PMVE
	CTFE elastomers	9010-75-7	CTFE, VDF
	Low temperature elastomers	CBI	TFE, VDF
Composite 4 - Aqueous Dispersions	PTFE	9002-84-0	TFE
	FEP	25067-11-2	TFE, HFP
	PFA	26655-00-5	TFE, PFVE
		31784-04-0	TFE, PEVE
	THV	25190-89-0	TFE, HFP, VDF

4/8 10/6/04
CS 10/15/04

Confidential business information (CBI) regarding the chemical identity of low temperature elastomers has been submitted to EPA under separate cover.

4.2.2 Composite 2

~~FEP, PFA~~ ~~ETFE~~ ~~PEE, PEA, THV, ETEE~~, and HTE dry melt resins are available in powder form. Equal weights of the powder form of each component (following the approach in the example for Composite Z in Section 4.1 above) will be mixed together in dry form to yield Composite 2. (wp 10/61)
CS 10/19/7

4.2.3 Composite 3

Fluoroelastomers are available in slab, lump, or sheet form. Composite 3 will be prepared following one of the following approaches:

- a) Equal weights of each component (following the approach in example for Composite Z in Section 4.1) will be mixed on a rubber mill to produce a homogenous slab of preset thickness to yield Composite 3.

Or

- b) Each component of Composite 3 will be cryogenically cooled (to make the elastomers brittle) and size-reduced (e.g., ground) to produce powder. Equal weights of the powder form of each component (following the approach in the example for Composite Z in Section 4.1) will be mixed together in dry form to yield Composite 3.

4.2.4 Composite 4

Aqueous dispersions of PTFE, FEP, PFA, and THV are available as dispersions containing 20 to 60% fluoropolymer solids by weight. Composite 4 will be prepared following one of the following approaches:

- a) Equal weights (on a dry solids basis) of each component in aqueous dispersion form (following the approach in example for Composite Z in Section 4.1) will be mixed together in liquid form. Solids will be separated from the resulting liquid composite to yield low water content (i.e., drip free) fine solids.

Or

- b) Solids will be separated from liquid for each component of Composite 4 to yield low water content (i.e., drip free) fine solids for each component. Equal weights of the solids form of each component (following the approach in the example for Composite Z in Section 4.1) will be mixed together to yield Composite 4.

Dyneon LLC

6744 33rd Street North
Oakdale, MN 55128
651 737 6700
651 737 7686 Fax

OPPT-2003-0012



299



January 13, 2005

Dr. Greg Fritz
Document Control Office (7407M)
Office of Pollution Prevention and Toxics (OPPT)
US Environmental Protection Agency
EPA East, Room 6428
1201 Constitution Avenue, NW
Washington, DC 20460
Telephone: 202-564-8930

2005 JAN 14 AM 10:22

RECEIVED
OPPT/CBIC

Re: **Fluoropolymer Incineration ECA Signature Materials – Docket Number
OPPT-2003-0012**

Dear Dr. Fritz:

This letter contains page 4 of the Incineration ECA Copy #2, transmitted to Dyneon in a letter from Jim Willis dated January 10, 2005. This page has been initialed as requested in that letter.

EPA also requested that Dyneon clarify our position regarding some changes we suggested to ECA page #21. We have determined that we do not want to reveal the chemical abstract numbers for entries #6 and #12 in the second table of the signature pages for the company specific version (Copy #5) of the Incineration ECA. Therefore, please do not make those changes, but revert to the unchanged page.

If you have any questions regarding the information contained in this letter, please contact me at 651-733-5637.

Respectfully submitted,

George H. Millet
Director, Quality, Environmental, Health and Safety
Dyneon LLC

2005 JAN 24 PM 2:42

RECEIVED
OPPT/NCIS

CONTAIN NO CBI

282357

- (D) Aqueous Fluoropolymer Dispersions Composite #4: (containing: ~~Ethene, tetrafluoro-, polymer with trifluoro(pentafluoroethoxy)ethene, CAS No. 31784-04-0; Ethene, tetrafluoro-, homopolymer, CAS No. 9002-84-0; 1-Propene, 1,1,2,3,3,3-hexafluoro-, polymer with tetrafluoroethene), CAS No. 25067-11-2; Propane, 1,1,1,2,2,3,3-heptafluoro-3- [(trifluoroethenyl)oxy]-, polymer with tetrafluoroethene, CAS No. 26655-00-5; Ethene, tetrafluoro-, polymer with trifluoro(pentafluoroethoxy)ethene, CAS No. 31784-04-0; 1-Propene, 1,1,2,3,3,3- hexafluoro-, polymer with 1,1-difluoroethene and tetrafluoroethene, CAS No. 25190-89-0; and polytetrafluoroethylene, DCN No. 630400000180.⁸~~

JW 1/4/05
William Meyer 1/13/05

JW 1/4/05
William Meyer 1/13/05

JW 1/4/05
William Meyer 1/13/05

The procedure for constructing each composite is described in Appendix A.4. The polymer components for each composite will be unfilled first quality product polymer, substantially free of inorganic constituents. Each component of the four composites to be tested under this ECA will be accompanied by a certificate of analysis showing it to meet applicable product specifications.

III. OBLIGATION OF SIGNATORY COMPANIES

A. The Companies are bound by the terms of this ECA as specified below.

B. Each Company shall be responsible for supplying the test substance(s) it manufactures for incorporation into the composite(s) to be tested under this ECA, as specified on each Company signature page and in Appendix A.3. The schedule for the testing program includes the deadline date by which the Companies must submit their contribution(s) to the facility(ies) that will be assembling the composites to be tested under this ECA. Any Company failing to comply with this ECA requirement will be in violation of this ECA as described in 40 CFR 790.65 (see Part XII of this ECA). In the event that one or more of the Companies are in violation as described above then the remaining Companies will inform EPA of the problem and request an EPA determination on how to proceed with the testing program described under this ECA. Each Company required to contribute to a particular composite is obligated to complete the testing required by this ECA for that composite. A Company shall not be responsible for any failure to perform its obligation under this ECA that is caused by circumstances beyond its control, that the Company could not have prevented through the exercise of due diligence.

⁸ EPA uses a variety of numerical identification systems for tracking chemicals. These include Chemical Abstract Service Registry numbers (CAS) (assigned to non-confidential listed chemicals), pre-manufacture notice (PMN) numbers (assigned by EPA when chemicals enter EPA's new chemical review process, document control numbers (DCN) (assigned by the Confidential Business Information Center for EPA tracking), and Accession (ACC) numbers (provided by EPA when a chemical identity requires protection as TSCA CBI). In addition, Polymer Exemption products will not have a TSCA Inventory ID number but may have a commercial trade identity.

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DuPont
Chestnut Run Plaza
P.O. Box 80713
Wilmington, DE 19880-0713

January 14, 2005

Document Control Office (7407M)
U.S. Environmental Protection Agency
Office of Pollution Prevention and Toxics (OPPT)
EPA East, Room 6428
1201 Constitution Avenue, NW
Washington, DC 20460

Attn: Dr. Greg Fritz

Re: Initialing of Fluoropolymer Incineration ECA

Dear Greg Fritz:

We are pleased to return the initialed pages of the "ECA for the Laboratory-Scale Incineration Testing of Fluoropolymers". This was requested by the EPA in a letter of January 10, 2005 (Jim Willis), following earlier letters of August 16, 2004 (Ward Penberthy), September 9, 2004 (Richard Leukroth) and October 5, 2004 (Ward Penberthy).

DuPont looks forward to the completion of the signature process by the EPA, and transmittal of the final signed agreement. If you have any questions regarding this letter, please contact me at 302-999-4658.

Sincerely,

L. William Buxton
Regulatory Affairs
DuPont Fluoroproducts

LWB/sth
Enclosure

CC: Francine C. Shaw (w/o Encl.)
David W. Boothe (w/o Encl.)

CONTAIN NO OPI

- (D) Aqueous Fluoropolymer Dispersions Composite #4: (containing: ~~Ethene, tetrafluoro-, polymer with trifluoro(pentafluoroethoxy)-ethene, CAS No. 31784-04-0;~~ Ethene, tetrafluoro-, homopolymer, CAS No. 9002-84-0; 1-Propene, 1,1,2,3,3,3-hexafluoro-, polymer with tetrafluoroethene), CAS No. 25067-11-2; Propane, 1,1,1,2,2,3,3-heptafluoro-3- [(trifluoroethenyl)oxy]-, polymer with tetrafluoroethene, CAS No. 26655-00-5; ~~Ethene, tetrafluoro-, polymer with trifluoro(pentafluoroethoxy)ethene, CAS No. 31784-04-0;~~ 1-Propene, 1,1,2,3,3,3- hexafluoro-, polymer with 1,1-difluoroethene and tetrafluoroethene, CAS No. 25190-89-0; and polytetrafluoroethylene, DCN No. 630400000180⁸.

JW 1/4/05
 JS 1/12/05
 JW 1/4/05
 JS 1/12/05
 JW 1/4/05
 JS 1/12/05

The procedure for constructing each composite is described in Appendix A.4. The polymer components for each composite will be unfilled first quality product polymer, substantially free of inorganic constituents. Each component of the four composites to be tested under this ECA will be accompanied by a certificate of analysis showing it to meet applicable product specifications.

III. OBLIGATION OF SIGNATORY COMPANIES

A. The Companies are bound by the terms of this ECA as specified below.

B. Each Company shall be responsible for supplying the test substance(s) it manufactures for incorporation into the composite(s) to be tested under this ECA, as specified on each Company signature page and in Appendix A.3. The schedule for the testing program includes the deadline date by which the Companies must submit their contribution(s) to the facility(ies) that will be assembling the composites to be tested under this ECA. Any Company failing to comply with this ECA requirement will be in violation of this ECA as described in 40 CFR 790.65 (see Part XII of this ECA). In the event that one or more of the Companies are in violation as described above then the remaining Companies will inform EPA of the problem and request an EPA determination on how to proceed with the testing program described under this ECA. Each Company required to contribute to a particular composite is obligated to complete the testing required by this ECA for that composite. A Company shall not be responsible for any failure to perform its obligation under this ECA that is caused by circumstances beyond its control, that the Company could not have prevented through the exercise of due diligence.

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XXIV. SIGNATURE**TEST SPONSOR****E.I. du Pont de Nemours and Company^{1, 2}**

Company technical contact person for handling correspondence marked as "Confidential"

Name: David W. Boothe
 Title: Strategic Planning Manager - DuPont Fluorosolutions *Products*
 Address: ~~Route 141 & Henry Clay, Wilmington, DE 19880-0711~~ 19805
 Phone Number: 302-999-4091 *4417 Lancaster Pike*
Chestnut Run 702

*WP 10/6/06**JS 1/12/05*

ECA Subject Chemicals for E. I. du Pont de Nemours and Company			
Entry	Composite	CAS Registry #	CAS 9CI Name
1	Dry non-melt Fluoropolymer Resin	CAS #9002-84-0	Ethene, tetrafluoro-, homopolymer
2	Dry melt Fluoropolymer Resin	CAS #25067-11-2	1-Propene, 1,1,2,3,3,3-hexafluoro-, polymer with tetrafluoroethene
3	Dry melt Fluoropolymer Resin	CAS #26655-00-5	Propane, 1,1,1,2,2,3,3-heptafluoro-3-(trifluoroethenyl)oxy]-, polymer with tetrafluoroethene
4	Dry melt Fluoropolymer Resin	CAS #31784-04-0	Ethene, tetrafluoro-, polymer with trifluoro(pentafluoroethoxy)ethene
5	Aqueous Dispersion	CAS #9002-84-0	Ethene, tetrafluoro-, homopolymer
6	Aqueous Dispersion	CAS #25067-11-2	1-Propene, 1,1,2,3,3,3-hexafluoro-, polymer with tetrafluoroethene
7	Aqueous Dispersion	CAS #26655-00-5	Propane, 1,1,1,2,2,3,3-heptafluoro-3-(trifluoroethenyl)oxy]-, polymer with tetrafluoroethene

¹ Data in the table lists the chemical(s) and composite contributions for which E.I. du Pont de Nemours and Company is responsible. The Company developed these data in response to EPA's letter of January 6, 2004.

² E.I. du Pont de Nemours and Company is not obligated under this ECA to perform Phase I PFOA Transport Testing (see Part III. C. and VII.A. of this ECA).



ROPE & GRAY LLP

ONE METRO CENTER 700 12TH STREET, NW SUITE 900 WASHINGTON, DC 20005-3948 202-508-4600 F 202-508-4650
BOSTON NEW YORK PALO ALTO SAN FRANCISCO WASHINGTON, DC www.ropesgray.com

RECEIVED
05

January 21, 2005

Mark A. Greenwood
(202) 508-4605
mark.greenwood@ropesgray.com

By Hand

Mr. Jim Willis
Office of Pollution Prevention and Toxics (7405M)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.

Dear Jim:

On behalf of Daikin America, Inc. (DAI), I am submitting the signature pages for the Enforceable Consent Agreements (ECAs) for incineration of fluorotelomer-based polymers and fluoropolymers. These signature pages are in response to your letter to Satoshi Doi, President of DAI, dated January 10, 2005.

DAI is pleased to complete these ECAs as a means to improve the information base on potential release of PFOA to the environment. In signing these documents as requested by the U.S. Environmental Protection Agency (EPA), it is important that DAI's understandings be clear:

- In providing DAI's signature on modifications to the ECA text related to information about other companies, DAI can only be acknowledging that the modifications have been made. We understandably cannot certify the accuracy of the underlying information provided by other companies.
- In previous correspondence with EPA, notably our letter to Wardner G. Penberthy on October 13, 2004, DAI has explained that the company's agreement to these ECAs relies on EPA's representation, contained in a February 3, 2004 letter from the Agency's Office of General Counsel, that another federal agency receiving "off-site" access to confidential business information must satisfy all aspects of the OPPTS TSCA CBI Protection Manual and EPA's regulations, both substantive and procedural.

ROPES & GRAY LLP

Mr. Jim Willis

- 2 -

January 21, 2005

DAI looks forward to working with EPA to better understand the health and environmental implications of PFOA. Thank you for your cooperation in the development of this ECA.

Best regards,



Mark A. Greenwood

Enclosures

FLUOROPOLYMER

- (D) Aqueous Fluoropolymer Dispersions Composite #4: (containing:
~~Ethene, tetrafluoro-, polymer with trifluoro(pentafluoroethoxy)-~~
~~ethene, CAS No. 31784-04-0; Ethene, tetrafluoro-, homopolymer,~~
 CAS No. 9002-84-0; 1-Propene, 1,1,2,3,3,3-hexafluoro-, polymer
 with tetrafluoroethene), CAS No. 25067-11-2; Propane,
 1,1,1,2,2,3,3-heptafluoro-3- [(trifluoroethenyl)oxy]-, polymer with
 tetrafluoroethene, CAS No. 26655-00-5; ~~Ethene, tetrafluoro-~~
~~polymer with trifluoro(pentafluoroethoxy)ethene, CAS No.~~
~~31784-04-0; 1-Propene, 1,1,2,3,3,3- hexafluoro-, polymer with~~
 1,1-difluoroethene and tetrafluoroethene, CAS No. 25190-89-0;
 and polytetrafluoroethylene, DCN No. 630400000180⁸.

JW 1/4/05
 SD 1/9/05
 JW 1/4/05
 SD 1/9/05
 JW 1/4/05
 SD 1/9/05

The procedure for constructing each composite is described in Appendix A.4. The polymer components for each composite will be unfilled first quality product polymer, substantially free of inorganic constituents. Each component of the four composites to be tested under this ECA will be accompanied by a certificate of analysis showing it to meet applicable product specifications.

III. OBLIGATION OF SIGNATORY COMPANIES

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⁸ EPA uses a variety of numerical identification systems for tracking chemicals. These include Chemical Abstract Service Registry numbers (CAS) (assigned to non-confidential listed chemicals), pre-manufacture notice (PMN) numbers (assigned by EPA when chemicals enter EPA's new chemical review process, document control numbers (DCN) (assigned by the Confidential Business Information Center for EPA tracking), and Accession (ACC) numbers (provided by EPA when a chemical identity requires protection as TSCA CBI). In addition, Polymer Exemption products will not have a TSCA Inventory ID number but may have a commercial trade identity.

to seek judicial review of any rule that may be adopted by EPA that imposes requirements to test any of the fluoropolymer chemicals listed in Appendix A.1 to this ECA.

XXII. RESERVATION OF RIGHTS BY COMPANIES

By signing this ECA, the Companies are not admitting that the requirements of TSCA Section 4 have been satisfied for promulgating a test rule to generate the data required by this ECA.

The Companies contend that the documents generated for the incineration testing program under this ECA are protected from public disclosure under 5 U.S.C. section 552(b)(4) and 15 U.S.C. section 2613(a) and do not constitute studies subject to disclosure under 15 U.S.C. section 2613(b). Accordingly, the public information disclosure provisions of this ECA are, in the view of the Companies, a waiver of legal rights.

XXIII. IDENTITY OF THE COMPANIES AND PRINCIPAL TEST SPONSOR

The Principal Test Sponsor is:

Fluoropolymer Manufacturers Group
Allen Weidman
The Society of the Plastics Industry, Inc.
1801 K Street, N.W., Suite 600K
Washington, DC 20006
202-974-5233

The Companies subject to this ECA are:

AGC Chemicals Americas, Inc.
229 East 22nd Street,
Bayonne, NJ 07002

Dyneon, LLC
6744 33rd Street,
Oakdale, MN 55128

Daikin America, Inc.
20 Olympic Drive,
Orangeburg, NY 10962

E.I. du Pont de Nemours and Company
~~Route 141 and Henry Clay~~ 1007 MARKET STREET
Wilmington, DE ~~19880-0711~~ 19898

wp 10/6/04
SD 1/19/05

XXIV. SIGNATURE

TEST SPONSOR
Dyneon, LLC^{1, 2}

Company technical contact person for handling correspondence marked as "Confidential"

Name: George H. Millet
 Title: Director, Quality, Environment, Health and Safety
 Address: 6744 33rd Street, Oakdale, MN 55128
 Phone Number: 651-733-5637

ECA Subject Chemicals for Dyneon, LLC *			
Entry	Composite	CAS Registry #	CAS 9CI Name
1	Dry non-melt Fluoropolymer Resin	CAS #9002-84-0	Ethene, tetrafluoro-, homopolymer
2	Dry non-melt Fluoropolymer Resin	CAS #26655-00-5	Propane, 1,1,1,2,2,3,3-heptafluoro-3-[(trifluoroethenyl)oxy]-, polymer with tetrafluoroethene
3	Dry melt Fluoropolymer Resin	CAS #25067-11-2	1-Propene, 1,1,2,3,3,3-hexafluoro-, polymer with tetrafluoroethene
4	Dry melt Fluoropolymer Resin	CAS #26655-00-5	Propane, 1,1,1,2,2,3,3-heptafluoro-3-[(trifluoroethenyl)oxy]-, polymer with tetrafluoroethene
5	Dry melt Fluoropolymer Resin	CAS #25190-89-0	1-Propene, 1,1,2,3,3,3-hexafluoro-, polymer with 1,1-difluoroethene and tetrafluoroethene
6	Dry melt Fluoropolymer Resin		

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SD 1/19/05

not 10/6/05
SD 1/19/05

¹ Data in the table lists the chemical(s) and composite contributions for which Dyneon, LLC is responsible. The Company developed these data in response to EPA's letter of January 6, 2004. There is both a Public and CBI version of this page because the Company has asserted that data in this table are considered by them to be entitled to treatment as TSCA confidential business information (CBI) (see Part XIV. D. of this ECA regarding confidentiality of information).

² Dyneon, LLC is obligated under this ECA to perform Phase I PFOA Transport Testing (see Part III. C. and VII.A. of this ECA).

Continued: ECA Subject Chemicals for Dyneon, LLC			
Entry	Composite	CAS Registry #	CAS 9CI Name
7	Dry melt Fluoropolymer Resin	CAS #35560-16-8	1-Propene, 1,1,2,3,3,3-hexafluoro-, polymer with ethene and tetrafluoroethene
8	Dry non-melt Fluoroelastomer Gum	CAS #27029-05-6	1-Propene, polymer with tetrafluoroethene
9	Dry non-melt Fluoroelastomer Gum	CAS #54675-89-7	1-Propene, polymer with 1,1-difluoroethene and tetrafluoroethene
10	Dry non-melt Fluoroelastomer Gum	CAS #26425-79-6	Ethene, tetrafluoro-, polymer with trifluoro(trifluoromethoxy) ethene
11	Dry non-melt Fluoroelastomer Gum	CAS #9010-75-7	Ethene, chlorotrifluoro-, polymer with 1,1-difluoroethene
12	Dry non-melt Fluoroelastomer Gum		
13	Aqueous Dispersion	CAS #9002-84-0	Ethene, tetrafluoro-, homopolymer
14	Aqueous Dispersion	CAS #25067-11-2	1-Propene, 1,1,2,3,3,3-hexafluoro-, polymer with tetrafluoroethene
15	Aqueous Dispersion	CAS #26655-00-5	Propane, 1,1,1,2,2,3,3-heptafluoro-3-[(trifluoroethenyl)oxy]-, polymer with tetrafluoroethene
16	Aqueous Dispersion	CAS #25190-89-0	1-Propene, 1,1,2,3,3,3-hexafluoro-, polymer with 1,1-difluoroethene and tetrafluoroethene

* Entries "X'd" out indicate redacted information claimed as CBI by the Company.

WP 10/6/01

SD 1/14/05

WP 10/6/01

SD 1/19/05

XXIV. SIGNATURE

TEST SPONSOR

E.I. du Pont de Nemours and Company^{1, 2}

Company technical contact person for handling correspondence marked as "Confidential"

Name: David W. Boothe
 Title: Strategic Planning Manager - DuPont Fluorosolutions
 Address: ~~Route 141 & Henry Clay, Wilmington, DE 19880-0711~~ 19805
 Phone Number: 302-999-4091
 Products
 SD 10/6/05
 4417 Lancaster Pike
 Chestnut Run 702

ECA Subject Chemicals for E. I. du Pont de Nemours and Company			
Entry	Composite	CAS Registry #	CAS 9CI Name
1	Dry non-melt Fluoropolymer Resin	CAS #9002-84-0	Ethene, tetrafluoro-, homopolymer
2	Dry melt Fluoropolymer Resin	CAS #25067-11-2	1-Propene, 1,1,2,3,3,3-hexafluoro-, polymer with tetrafluoroethene
3	Dry melt Fluoropolymer Resin	CAS #26655-00-5	Propane, 1,1,1,2,2,3,3-heptafluoro-3-(trifluoroethenyl)oxy]-, polymer with tetrafluoroethene
4	Dry melt Fluoropolymer Resin	CAS #31784-04-0	Ethene, tetrafluoro-, polymer with trifluoro(pentafluoroethoxy)ethene
5	Aqueous Dispersion	CAS #9002-84-0	Ethene, tetrafluoro-, homopolymer
6	Aqueous Dispersion	CAS #25067-11-2	1-Propene, 1,1,2,3,3,3-hexafluoro-, polymer with tetrafluoroethene
7	Aqueous Dispersion	CAS #26655-00-5	Propane, 1,1,1,2,2,3,3-heptafluoro-3-(trifluoroethenyl)oxy]-, polymer with tetrafluoroethene

¹ Data in the table lists the chemical(s) and composite contributions for which E.I. du Pont de Nemours and Company is responsible. The Company developed these data in response to EPA's letter of January 6, 2004.

² E.I. du Pont de Nemours and Company is not obligated under this ECA to perform Phase I PFOA Transport Testing (see Part III. C. and VII.A. of this ECA).

APPENDIX A.3
COMPOSITION OF COMPOSITES TO BE TESTED

The four composite test substances for this test program are presented below in Table A.3-1 with the fluoropolymer types, CAS numbers, and associated monomers for these fluoropolymers. Each fluoropolymer used in each relevant test substance composite will have been made using APFO.

Table A.3-1. Test Substance Composites by Type

Test Substance	Fluoropolymer Type	CAS Number	Associated Monomers
Composite 1 - Dry non-melt resin	PTFE	9002-84-0	TFE
	Modified PTFE	26655-00-5	TFE, PPVE
Composite 2 - Dry melt resins	FEP	25067-11-2	TFE, HFP
	PFA	26655-00-5	TFE, PPVE
		31784-04-0	TFE, PEVE
	THV	25190-89-0	TFE, HFP, VDF
	ETFE	68258-05-5	TFE, E
HTE	35560-16-8	TFE, HFP, E	
Composite 3 - Fluoroelastomers Fluoroelastomers Copolymers	Fluoroelastomer	9011-17-0	VDF, HFP
	Fluoroelastomer	25190-89-0	TFE, HFP, VDF
	Terpolymers		
	Base resistant elastomers	54675-89-7,	TFE, VDF, P
		27029-05-6	TFE, P
	Perfluoroelastomers	26425-79-6	TFE, PPVE
CTFE elastomers	9010-75-7	CTFE, VDF	
Low temperature elastomers	CBI	TFE, VDF	
Composite 4 - Aqueous Dispersions	PTFE	9002-84-0	TFE
	FEP	25067-11-2	TFE, HFP
	PFA	26655-00-5	TFE, PPVE
		31784-04-0	TFE, PEVE
THV	25190-89-0	TFE, HFP, VDF	

WSP 10/6/04
-SD 1/19/05

Confidential business information (CBI) regarding the chemical identity of low temperature elastomers has been submitted to EPA under separate cover.

4.2.2 Composite 2

~~FEP, PFA, THV, ETBE~~ ^{FEP, PFA, ETFE} and HTE dry melt resins are available in powder form. Equal weights of the powder form of each component (following the approach in the example for Composite Z in Section 4.1 above) will be mixed together in dry form to yield Composite 2. WRP 10/6/1. RD: 1/19/25

4.2.3 Composite 3

Fluoroelastomers are available in slab, lump, or sheet form. Composite 3 will be prepared following one of the following approaches:

- a) Equal weights of each component (following the approach in example for Composite Z in Section 4.1) will be mixed on a rubber mill to produce a homogenous slab of preset thickness to yield Composite 3.

Or

- b) Each component of Composite 3 will be cryogenically cooled (to make the elastomers brittle) and size-reduced (e.g., ground) to produce powder. Equal weights of the powder form of each component (following the approach in the example for Composite Z in Section 4.1) will be mixed together in dry form to yield Composite 3.

4.2.4 Composite 4

Aqueous dispersions of PTFE, FEP, PFA, and THV are available as dispersions containing 20 to 60% fluoropolymer solids by weight. Composite 4 will be prepared following one of the following approaches:

- a) Equal weights (on a dry solids basis) of each component in aqueous dispersion form (following the approach in example for Composite Z in Section 4.1) will be mixed together in liquid form. Solids will be separated from the resulting liquid composite to yield low water content (i.e., drip free) fine solids.

Or

- b) Solids will be separated from liquid for each component of Composite 4 to yield low water content (i.e., drip free) fine solids for each component. Equal weights of the solids form of each component (following the approach in the example for Composite Z in Section 4.1) will be mixed together to yield Composite 4.



Chemicals Americas, Inc.

Bayonne Site
229 East 22nd Street
Bayonne, NJ 07002
Telephone: (201)858-8900
Fax: (201) 858-8986

January 25, 2005

Attn. Dr. Greg Fritz
Document Control Office (7407M)
Office of Pollution Prevention and Toxics (OPPT)
US Environmental Protection Agency
EPA East, Room 6428
1201 Constitution Avenue, NW
Washington, DC. 20460

RECEIVED
OPPT/TOXIC
05 JAN 27 AM 11:05

Re: Initialed Replacement Page for Fluoropolymer Incineration ECA

Please find enclosed, initialed replacement page; Copy # 2-Public Version, page 4, as required under the enforceable consent agreement (ECA) for the laboratory-scale incineration testing of fluoropolymer chemicals.

Respectfully submitted,

David H. Lebedin

2005 FEB -3 AM 9:43

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OPPT/TOXIC
CONTAIN NO CBI

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RECEIVED
OPPT CDIC
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Aqueous Fluoropolymer Dispersions Composite #4: (containing:
~~Ethene, tetrafluoro-, polymer with trifluoro(pentafluoroethoxy)-~~
~~ethene, CAS No. 31784-04-0;~~ Ethene, tetrafluoro-, homopolymer,
CAS No. 9002-84-0; 1-Propene, 1,1,2,3,3,3-hexafluoro-, polymer
with tetrafluoroethene), CAS No. 25067-11-2; Propane,
1,1,1,2,2,3,3-heptafluoro-3- [(trifluoroethenyl)oxy]-, polymer with
tetrafluoroethene, CAS No. 26655-00-5; ~~Ethene, tetrafluoro-~~
~~polymer with trifluoro(pentafluoroethoxy)ethene, CAS No.~~
~~31784-04-0;~~ 1-Propene, 1,1,2,3,3,3- hexafluoro-, polymer with
1,1-difluoroethene and tetrafluoroethene, CAS No. 25190-89-0;
and polytetrafluoroethylene, DCN No. 630400000180⁸.

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MR 1/25/05 JW 1/4/0
MR 1/25/05 JW 1/4/0

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⁸ EPA uses a variety of numerical identification systems for tracking chemicals. These include Chemical Abstract Service Registry numbers (CAS) (assigned to non-confidential listed chemicals), pre-manufacture notice (PMN) numbers (assigned by EPA when chemicals enter EPA's new chemical review process, document control numbers (DCN) (assigned by the Confidential Business Information Center for EPA tracking), and Accession (ACC) numbers (provided by EPA when a chemical identity requires protection as TSCA CBI). In addition, Polymer Exemption products will not have a TSCA Inventory ID number but may have a commercial trade identity.