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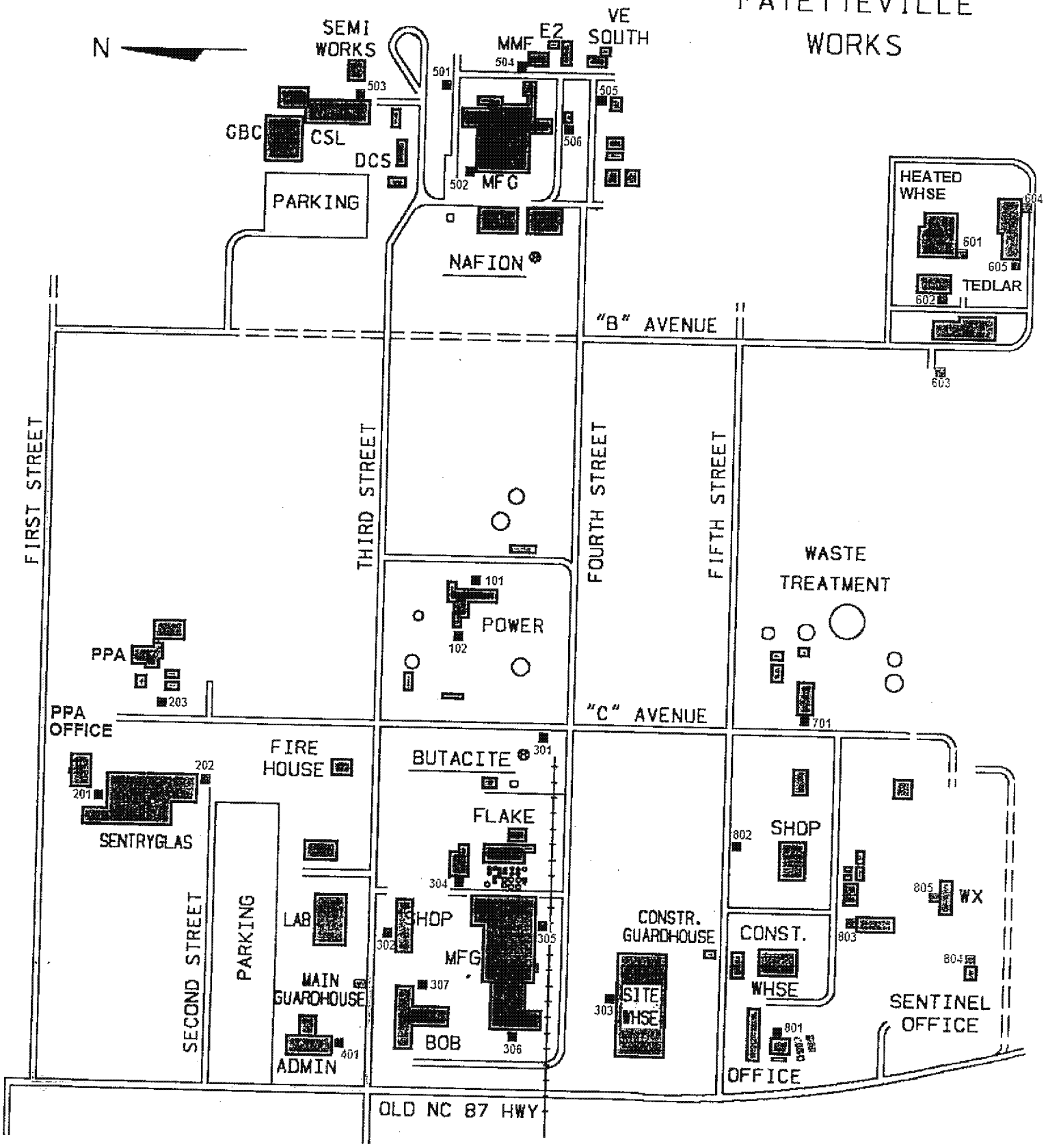

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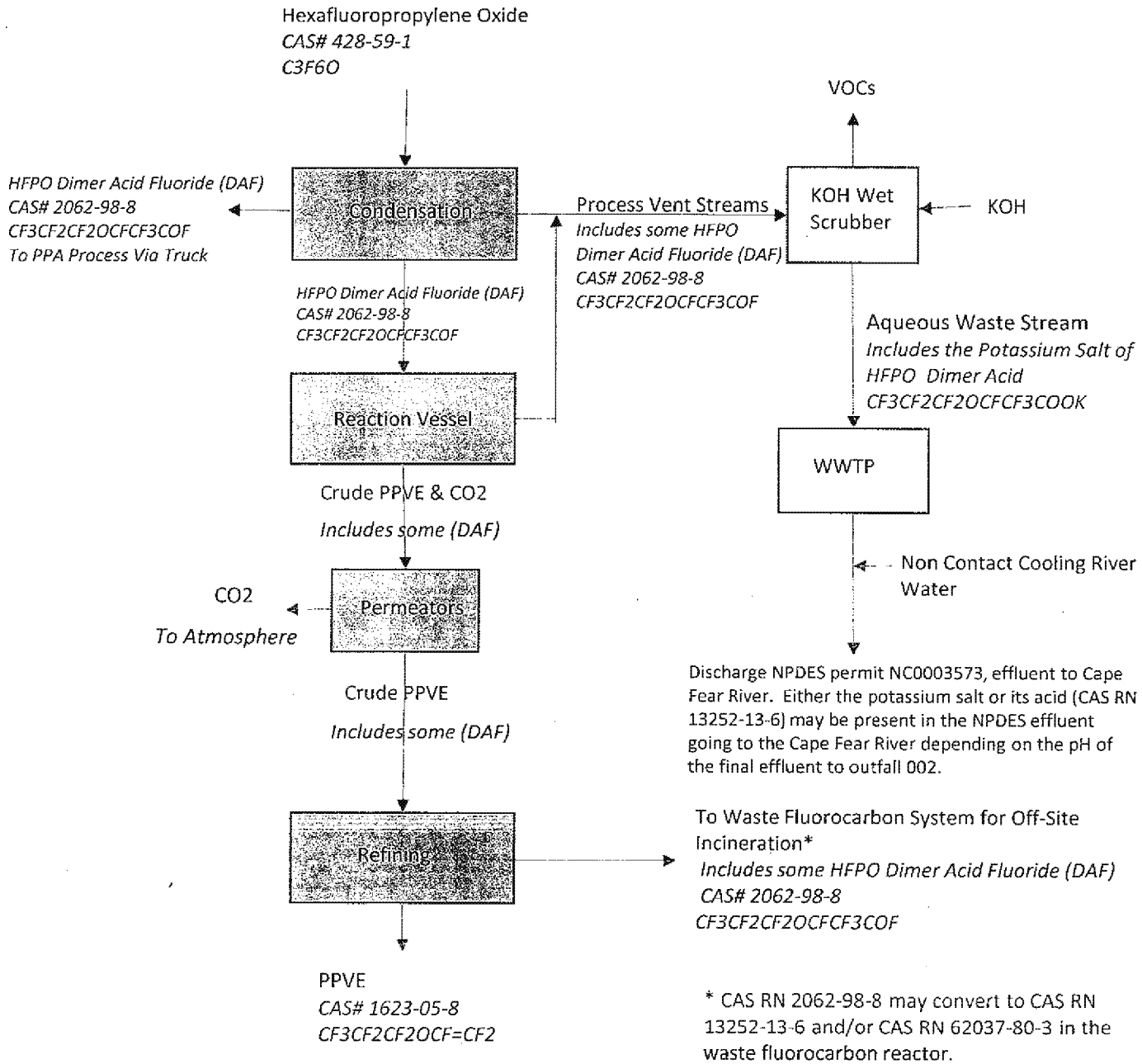
Summary Flow Chart
Perfluoropropyl Vinyl Ether (PPVE) Manufacturing Wastewater Treatment Plant (WWTP)



* CAS RN 2062-98-8 may convert to CAS RN 13252-13-6 and/or CAS RN 62037-80-3 in the waste fluorocarbon reactor.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

FEB 1 2010

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Jane Bradd Andersen, Regulatory Affairs
E.I. du Pont de Nemours and Company, Inc.
Chestnut Run Plaza
P.O. Box 80702
Wilmington, Delaware 19880-0702

Re: Modification of Consent Order
for PMNs P-08-508 and P-08-509

Dear Ms. Andersen:

This letter modifies the requirements of the above referenced TSCA 5(e) Consent Order in response to your requests for: 1) alternative respiratory protection for P-08-508 in the "Protection in the Workplace" and "New Chemical Exposure Limits" (NCELs) sections of the Order, and 2) changes to subsection (c) "Performance Criteria for Sampling and Analytical Method" in the NCELs section of the Order.

EPA has reviewed and hereby approves the alternative respirators that you requested, i.e., 3M Whitecap 8100 and 8100B respirators to meet the requirements of: (1) the Protection in the Workplace paragraph (a)(6) "Authorized Respirators", and (2) the New Chemical Exposure Limit paragraph (e)(2) "Selection of Appropriate Respiratory Protection" for measured concentrations less than or equal to 1,000 times the NCEL.

EPA has also reviewed the request concerning changes to subsection (c) "Performance Criteria for Sampling and Analytical Method" in the NCELs section of the Consent Order. This included paragraph (4)(iv)(I) Initial Calibration, where the essential changes from the Consent Order are: 1) the method utilized six calibration standards, and 2) that the standard concentrations are below those specified in the Consent Order with the modified calibration ranging from 0.01 to 0.2 x NCEL, and paragraph (4)(v)(II), Subsequent Calculation, where the change from the Consent Order is that the spikes are prepared for subsequent exposure monitoring at 0.1 x NCEL rather than at the prescribed NCEL concentration itself. Your request states that unique operating requirements of the LC/MS/MS technology were more sensitive than previously used analytical technologies. EPA has determined that the performance criteria required by the Consent Order are satisfied utilizing your proposed method. Your change to lower concentrations for Initial Calibration is necessary to avoid saturating the LC/MS/MS instrumentation, and will depend on accurate calculations of the dilution ratio in order to ensure proper measurement of potential worker exposures that exceed the NCEL. Regarding your change to the

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Subsequent Calculation requirement, your request states a matrix spike at the NCEL concentration would saturate the detector and potentially cause instrument contamination and that the 0.1 NCEL spike in the method is within the range of the calibration curve and below the saturation level of the MS/MS detection system. EPA has determined that the performance criteria required by the Consent Order are satisfied utilizing your proposed method. Thus, EPA hereby approves these variations from the Performance Criteria in the NCELs section of the Order.

All other terms and conditions of the Consent Order remain unchanged. This modification is effective as of the date of this letter.

If you have questions concerning this letter, please direct them to Rose Allison, the Program Manager for these PMNs, at (202)-564-8970.

Sincerely,

Jim Willis, Director
Chemical Control Division (7405 M)

FAX TRANSMISSION

ENVIRONMENTAL PROTECTION AGENCY

1200 Pennsylvania Avenue, NW
Washington, DC 20460
Office# (202) 564-8999
Fax# (202) 564-9490

Pages: 3 (Including Cover sheet)

Fax# 302/999-2177

To: Jane Bradd Andersen

Date: Feb 1, 2010

From: Rose Allison

Subject: Modifications of Consent Order

Comments: This "modifies" non CBI sections of the Consent Order

Please confirm "Contains No CBI"