Message

From: Krasnic, Toni [krasnic.toni@epa.gov]
Sent: 11/20/2015 10:53:05 AM
To: Dan Gutting Ex. 6 - Personal Privacy
CC: Lloyd, Tyler [lloyd.tyler@epa.gov]
Subject: RE: c-8 fluoropolymer

Hi Dan,

Thank you for the additional information.

Were you able to obtain the cas #s from Texchem in the UK for Texfin C6AD and J267?

How did the C-6 from Archroma perform?

Import of Texfin C8 for processing in U.S. would be considered a new use and would require submission of a Significant New Use Notice (SNUN) to EPA. You wouldn't need a SNUN for C6 chemicals as long as they're on Inventory – please check with manufacturer about the status of it chemicals for import to US.

Continued processing of APG559 from Advanced Polymers would be considered ongoing use and you could continue processing that chemical into your products.

Thanks,

Toni Krasnic
Existing Chemicals Branch
EPA/OCSPP/OPPT/CCD/ECB
WJC East, 4134D | (202) 564-0984

From: Dan Gutting [mailto: Ex. 6 - Personal Privacy
Sent: Thursday, November 19, 2015 5:53 PM
To: Krasnic, Toni <krasnic.toni@epa.gov>; Kramek, Niva <kramek.niva@epa.gov>
Subject: Re: c-8 fluoropolymer

Hi Toni,
From your list of sources I was only able to get one material to test. It is a C-6 from Archroma called N2114.

I have attached our old published sheet showing 50 repeats of ASTM D-1913 on Cotton, Polycotton, and Nylon. As you know we also guarantee these for 50 washings in Sport-Wash.
#1356 and #1357 are both C-8's. The black line (silicone) obviously does very well but does not resist detergent.

The current tests compare N2114 with a C-6 and a C-8 from the UK that seem to be the best available. I would prefer to use the C-8 because I would only have to use 5% to get better performance than 15% of their C-6. I have attached their literature. I trust that you will not share with anyone that these Texfin products appear to be the best available.

What can you suggest I might do to get approval to bring these into the US.
Regards,
Dan

On Tue, Nov 10, 2015 at 8:16 AM, Krasnic, Toni <krasnic.toni@epa.gov> wrote:

Hi Dan,

Thanks for the additional information. We'll be in touch if we need any additional information.

Please keep us informed of new developments and testing results.

Thanks,

Toni Krasnic

Existing Chemicals Branch

EPA/OCSPP/OPPT/CCD/ECB

WJC East, 4134D | (202) 564-0984

From: Dan Gutting [mailto: Ex. 6 - Personal Privacy
Sent: Monday, November 09, 2015 11:45 AM

To: Krasnic, Toni <krasnic.toni@epa.gov>
Subject: Re: c-8 fluoropolymer

Dear Toni,

Reading the Docket you referred me to it does appear that the EPA intended to allow continuing uses and I should have been aware of the comment period so I could have indicated why my customers need the performance I could only supply with C-8s. I will try to test materials from the vendors you have listed below.

Any other suggestions would be very welcome.

Regards,

Dan

On Fri, Nov 6, 2015 at 1:50 PM, Krasnic, Toni <krasnic.toni@epa.gov> wrote:

Dear Dan,

Thank you for the additional background information. I'm also cc'ing Tyler who's the lead on this rule.

Can you please provide the following additional information:

1. APG559 from Advanced Polymers Inc

    a. What is the CAS # for the perfluorochemical in APG559 from Advanced Polymers Inc?

API replied that their source for the material in APG559 would not reveal the cas#s.

    b. What are your remaining stocks (in lbs) of APG559 from Advanced Polymers?

I Have 440 lbs of APG559

46 doz #1356 17oz (15% APG559) 88 lbs

35 doz #1357 10.5 oz (3% APG559) 8.5 lbs

40 1 gallon #1357GAL (3% APG559) 10 lbs

total 546.5 lbs

This is all using APG559 since my supply of Mason Masurf FP230 ended a couple years ago.

2. Atsko products

    a. Are *Permanent Water-Guard - 10 oz. Aerosol* and *Permanent Water-Guard Gallon* the only two products that you sell with this perfluorochemical? If not, what are the other products?

    b. What are your remaining stocks of these products?

    c. Please describe the specific uses of these two products.

#1356 is more concentrated so it can provide the same 25 Wash Guarantee on Cotton and Cotton Blends.

#1357 is intended for 100% synthetic fabrics that are frequently washed. We used to offer #1356 gallon, but discontinued it because most of the large scale uses have migrated to 100% synthetic shells.

The biggest use is for people who must wash clothing frequently but still must maintain waterproofness and breath-ability.Hunters, biologists, naturalists (not so much birders because birds have poor sense of smell) EMT's . Ski area workers and instructors where high appearance requires frequent washing but repellent must be effective for all day exposure.

If any of this information is confidential, please mail the information to the address below and mark all pages as Confidential Business Information:

OPPT Document Control Office (DCO)

Attention: Docket ID Number EPA-HQ-OPPT-2013-0225

1201 Constitution Avenue NW

EPA East Building Room 6428

Washington, DC 20004

Additional sources of C8 *substitutes* (note: none of these companies supply C8 chemicals) can be obtained from companies participating in the 2010/2015 PFOA Stewardship Program. Their contact information is available at http://www2.epa.gov/assessing-and-managing-chemicals-under-tsca/20102015-pfoa-stewardship-program-2014-annual-progress and also listed below (alphabetically):

- Arkema: David Kreh, david.kreh@arkema.com
- Asahi: Warren Lehrenbaum, wlehrenbaum@crowell.com
- BASF: Patrick Meyer, patrick.meyer@basf.com
- Chemours: Laura Korte, laura.a.korte@chemours.com
- Clariant: Erin Russell, erin.russell@clariant.com
- Daikin: Ralph Werling; werling@daikin-america.com
- Dyneon/3M: Gary Hohenstein; gahohenstein@mmm.com
- Solvay Solexis: Virginia Hubert, virginia.hubert@solvay.com

Thank you for your efforts in making the transition from C8 perfluorochemicals to C6 or other substitutes.

Sincerely,

Toni Krasnic

Existing Chemicals Branch

EPA/OCSPP/OPPT/CCD/ECB

WJC East, 4134D | (202) 564-0984

From: Dan Gutting [mailto Ex. 6 - Personal Privacy
Sent: Thursday, November 05, 2015 5:16 PM
To: Krasnic, Toni <krasnic.toni@epa.gov>
Subject: Re: c-8 fluoropolymer

Thank you Tini,

Following is a bit of background that should have been submitted as a comment.

My active for my item #1357 was Masurf FP-230 untill it was discontinued a couple years ago. Since then I have been using APG559 from advanced Polymers Inc, for both #1356 and #1357. http://www.atsko.com/waterproofing/

My last purchase was a 2205 lb tote on 2/11/13. At that time they said I could still buy it through 2015. When I got back to them in July to make a final purchase, they said their raw material was already exhausted.

We have been testing every C-6 or other alternative we can find and nothing approaches the performance we have been delivering for the last 20 years. I have attached labels and instruction sheets to document that we have been guaranteeing, in writing, that our product would still score 90 or better on the ASTM 1913 water spray test after 25 washings in Sport-Wash.

While this kind of performance is unnecessary for the average person, it is critical for persons hunting or working outdoors who have to wash their outer clothes frequently. A serious hunter will wash his clothes after every hunt to ensure that odors are removed. Naturalists and outdoor photographers and others who work with wildlife have the same needs. EMTs and others exposed to blood may also wash their DWR materials frequently.

With C-6s, silicones, and other substitutes it is necessary to reapply chemicals as often as every washing. This creates unnecessary and frequent exposure for personal and for the environment. It is extremely detrimental to hunters because each reapplication of chemical creates odor signatures that game can easily detect. As you might expect, if a chemical can endure 25 to 75 wash cycles, it is not volatilizing and a significant rate in the woods.

I will attempt to get cas #s from Texchem in the UK for Texfin C6AD and J267 as these are the most promising substitutes , but we continue to search for others. If you know of any US sources with anything worth testing , I would be grateful for a lead.

Regards,

Dan

On Thu, Nov 5, 2015 at 5:02 PM, Krasnic, Toni <krasnic.toni@epa.gov> wrote:

Hi Dan,

As per our discussion yesterday, here's the link to the Docket for the Significant New Use Rule for Long-Chain Perfluoroalkyl Carboxylates and Perfluoroalkyl Sulfonates: http://www.regulations.gov/#!docketDetail;D=EPA-HQ-OPPT-2013-0225. The proposed rule is the first document in that docket.

Please let me know if you have any additional questions.

Sincerely,

Toni Krasnic

Existing Chemicals Branch

EPA/OCSPP/OPPT/CCD/ECB

WJC East, 4134D | (202) 564-0984

From: Dan Gutting [mailto: Ex. 6 - Personal Privacy
Sent: Tuesday, November 03, 2015 3:15 PM
To: Krasnic, Toni <krasnic.toni@epa.gov>
Subject: c-8 fluoropolymer

Dear Toni,

I am looking at many alternatives to the c-8 repellents that have been discontinued.

Can you direct me to someone that can tell me if an alternative chemical is acceptable to import and use in my repellent products?

Thanks,

Dan

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Dan Gutting, Atsko Inc, 2664 Russell, Orangeburg SC 29115 800-845-2728 fax 803 531 2139 www.atsko.com

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