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December 29, 2006

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VIA COURIER

Dear Sir or Madam,

On behalf of the companies identified below, I am submitting six paper copies of the Interim Report No. 3 required by the terms of the Enforceable Consent Agreement (ECA) for the Laboratory-Scale Incineration Testing of Fluoropolymers (EPA Docket No. OPPT-2003-0071). The due date for this submission is January 2, 2007.

This submission is being made on behalf of the following companies:

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

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

E. I. du Pont de Nemours and Company
1007 Market Street
Wilmington, DE 19898

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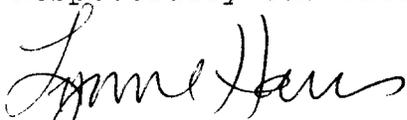
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Dyneon, LLC
6744 33rd Street
Oakdale, MN 55128

If you have any questions on this submission, please
contact me at 202-974-5217.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Lynne Harris".

Lynne Harris
Vice President, Science and Technology

ATCH

Title: Enforceable Consent Agreement for the Laboratory-Scale
Incineration Testing of Fluoropolymers - Interim
Report No. 3

OPPT Docket ID No: OPPT-2003-0071

Date of Interim Report: December 29, 2006

This Report covers the period from July 4, 2006 to
December 31, 2006.

- 1) List or description of significant ECA Test Program milestones during this period:

Phase I transport testing was completed; the Phase I Letter Report was submitted on August 2, 2006.

See attached quarterly QA/QC status reports.

- 2) Description of Difficulties: (If none indicate N/A)

Deviations from the Phase I QAPP during thermal reactor system testing were described in the Phase I Letter Report. Since the submission of the Phase I Letter Report, there have been no experimental problems to report.

- 3) Actions taken in response to difficulties: If none indicate N/A)

Corrective action forms have been prepared to document revisions implemented during Phase I thermal reactor system testing and to clarify project requirements for quality control samples (continuing calibration check standards and laboratory control sample (LCS)) associated with upcoming Phase II total fluorine (Wickbold Torch) analyses. See attached quarterly QA/QC status reports.

- 4) Other information relevant to the progress of the testing program: (If none indicate N/A)

In a news release dated October 2, 2006, MPI Research announced that it had acquired Exygen Research. The news release notes "Exygen Research will continue to operate from its State College location" and "customers will not see a change in the quality and timeliness of service that they have become accustomed."

**Quarterly Status Report – July Through September 2006
ECA Incineration Testing Program**

Date: November 22, 2006

From: David R. Blye, QA Unit - Environmental Standards, Inc.

To: Facility Management – Robert J. Giraud
Study Director – Philip H. Taylor, Ph.D.

QA/QC Status for the Period July 1 through September 30, 2006:

Dates and Locations of In-Phase Audits:

- An in-phase audit of the University of Dayton Research Institute (UDRI) facilities associated with Phase I transport testing was performed on July 18 and 19, 2006.
- An in-phase audit of Exygen Research was performed by the Exygen QAU on July 21 and 24 and on August 9 and 10, 2006.
- An in-phase audit of StereoChemical, Inc. was performed on July 28, 2006.

Dates and Locations of Facility Audits:

- A facility audit of UDRI was performed on July 18 and 19, 2006.
- A facility audit of Exygen Research was performed on July 20 and 21, 2006.
- A facility audit of StereoChemical, Inc. was performed on July 28, 2006.

Data Verification and Validation:

- The analytical data packages prepared for review by Exygen Research and StereoChemical, Inc. were reviewed by Donald J. Lancaster of Environmental Standards, Inc. from July 27 to August 1, 2006.

Status of Corrective Actions:

- A Corrective Action Form dated July 17, 2006 was prepared by Richard C. Striebich of UDRI. This corrective action was implemented during Phase I transport testing.
- A Corrective Action Form dated July 27, 2006 was prepared by Takahiro Yamada of UDRI. This corrective action was implemented during Phase I transport testing.
- A Corrective Action Form dated July 27, 2006 was prepared by Richard C. Striebich of UDRI. This corrective action was implemented during Phase I transport testing.
- A Corrective Action Form dated September 11, 2006 was prepared by Donald J. Lancaster of Environmental Standards, Inc. during review of StereoChemical Phase I total fluorine data. Data quality was not affected by this issue. This corrective action will be implemented during total fluorine analysis associated with the Phase II projects.

**Quarterly Status Report – October Through December 2006
ECA Incineration Testing Program**

Date: December 22, 2006

From: David R. Blye, QA Unit - Environmental Standards, Inc.

To: Facility Management – Robert J. Giraud
Study Director – Philip H. Taylor, Ph.D.

QA/QC Status for the Period October 1 through December 31, 2006:

Dates and Locations of In-Phase Audits:

- No Action during this quarter.

Dates and Locations of Facility Audits:

- No Action during this quarter.

Data Verification and Validation:

- No Action during this quarter.

Status of Corrective Actions:

- A Corrective Action Form dated November 22, 2006 was prepared by David R. Blye of Environmental Standards, Inc. during planning for Phase II total fluorine analysis to revise preparation of the QC Laboratory Control Sample (LCS). Phase I data quality was not affected by this issue. This corrective action will be implemented during total fluorine analysis associated with the Phase II projects.