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File-32

VIA FEDERAL EXPRESS

TO: Sponsors of Hydrolysis Testing DATE: January 24, 1989
FROM: Robert M. Sussman FILE NO: 015237-0000
William K. Rawson COPIES TO:
SUBJECT: MCIA Hydrolysis Testing

Enclosed are copies of:

- (1) A request for an extension of the due date for the submission of final test results, filed with EPA today (January 24); and
- (2) A request for an extension of the due date for the submission of a study plan, filed with EPA on January 13.

We spoke with John Neylan of EPA's Office of Compliance Monitoring and Frank Benenati of the Test Rules Development Branch earlier today concerning our request for an extension of the due date for the submission of final test results. They made the following points during our conversations:

- (1) This type of request for an extension of the due date for submission of final test results, based on technical difficulties at the laboratory, is generally granted although each such request obviously needs separate consideration;
- (2) EPA generally prefers not to receive such a request shortly before the filing deadline;
- (3) EPA will attempt to process the request quickly; and
- (4) The appropriate response will be determined by the Test Rules Development Branch (Frank Benenati and Roger Nelson).

We attempted to return a call to Roger Nelson of TRTB, but were unable to reach him. We will follow-up with Roger Nelson tomorrow.

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We also called ATS to get an update on their efforts to resolve the quality control problem. In Phil Simon's absence, Mary Bennett, ATS Project Manager for the hydrolysis testing, confirmed that ATS is making every effort to solve the problem this week. However, she said they have not yet confirmed that the low recoveries are attributable to a trapping problem, and they do not know for certain that they will be able to solve the problem this week. Accordingly, they do not know for certain that they will be able to restart the test during the week beginning January 30.

We also called Ed Hobbs, who confirmed that he has had several calls with Phil Simon and made a concerted effort to make ATS more responsive to our concerns about contract and scheduling issues.

Finally, we spoke to Tom Robinson yesterday concerning the quality control problems at ATS. Tom called MRI today, and confirmed that they could start the hydrolysis test in their laboratory on Monday, January 30. MRI would charge approximately \$16,000 if the hydrolysis testing takes 28 days (the maximum incubation period), and less if the test is completed in a shorter time period.

We will follow up on this matter with telephone calls to EPA tomorrow, and will keep you informed. We suggest a conference call of all test sponsors at the earliest possible date, and will call everyone tomorrow morning (Wednesday) to arrange for such a conference call.