

AR226 - 3643

FYI - 00 - 001378

FYI - 0406 - 01378

24 PP



Mark G. Herwig
Manager, CMP Programs
GE Corporate Environmental Programs
3135 Easton Turnpike, W1B
Fairfield, CT 06828
(203) 373-2817
Mark.Herwig@corporate.ge.com

RECEIVED
OPT ACIC
2006 MAY -1 PM 12:24

CONTAIN NO CBI

April 17, 2006

TSCA Confidential Business Information Center (7407M)
EPA East - Room 6428 Attn: FYI
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001

CERTIFIED MAIL

RECEIVED
OPT CBIC
04 APR 24 AM 10:56

RE: Supplemental Submission
TSCA 8(e) FYI Notice - 0804-01378

On August 3, 2005, the General Electric Company (GE) submitted a package of corroborative data on Ammonium Perfluorooctanoate (APFO) CAS# 3825-26-1, the ammonium salt of Perfluorooctanoic Acid (PFOA) CAS# 335-67-1. The data submitted on August 3, 2005 confirmed and supported data already known to the U.S. Environmental Protection Agency (the "Agency"), as embodied in numerous reports, studies, draft risk assessments, and related manufacturer supplied chemical information with the Agency.

Since the August 3, 2005 submission, GE tested two different dry solid samples of manufactured T-SAN (Teflon-styrene acrylonitrile co-polymer), the product described under Processing Scenario 2 in the August 3, 2005 submission. Results of such testing (in parts per billion [ppb]) are provided in the following table.

Resin Sample	Original Test Method Result	Alternative Test Method Result
CC3YFG	78,000	110,000
RD 9112	130,000	160,000

According to the laboratory chemist conducting the analysis, the Alternative Test Method results are viewed as a better representation of the sample's PFOA content. The full laboratory results report is provided as Attachment A.

As provided in the August 3, 2005 submission, T-SAN is often used in small quantities in the manufacture of thermoplastic resins (or "thermoplastics"). Such thermoplastic resins may be found in a variety of end-use market segments including, but not limited to, electronics, automotive and construction.



2 5 0 6 0 0 0 0 0 3

mch 294961

000001

As with the August 3, 2005 submission, none of the information provided in this submission represents new information, or information that would substantially change or alter the current understanding of any potential risk posed by PFOA to human health or the environment. However, given EPA's continued interest in this substance, GE is submitting this data for record completeness.

Questions regarding this submission should be directed to me.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark G. Herwig", with a stylized flourish at the end.

Mark G. Herwig, Manager
CMP Programs
GE Corporate Environmental Programs

000002