



March 23, 2016

Mr. Kenneth Moss
Chemical Control Division (7405M)
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460-0001

Submitted via email and <http://www.regulations.gov>

Re: Comments Concerning EPA's Chlorinated Paraffins; Request for Available Information on PMN Risk Assessments; Docket EPA-HQ-OPPT-2015-0789.

Mr. Moss:

The Aerospace Industries Association (AIA) appreciates the opportunity to make comment on the Request for Available Information on PMN Risk Assessments for Chlorinated Paraffins (CPs) (EPA-HQ-OPPT-2015-0789). Founded in 1919, AIA is the premier trade association representing over 350 major aerospace and defense manufacturers and suppliers, and over one million aerospace and defense workers. Our members represent the United States of America's leading manufacturers and suppliers of civil, military, and business aircraft, helicopters, unmanned aerial systems, missiles, space systems, aircraft engines, material, and related components, equipment services, and information technology.

AIA membership is firmly committed to safe and sustainable chemical management. As we outlined in our letter to Dr. Maria Doa on February 16, 2016, in order to understand the use of the specific chlorinated paraffin substances identified in the Notice, additional time to work within our member companies, as well as suppliers, to determine existing uses, is necessary. Although we are aware of uses in machining for parts manufacturing, some CPs may be used more directly in coatings and sealants. We do have strong reason to believe, however, that any action by the Environmental Protection Agency (EPA) on medium-chain chlorinated paraffins (MCCPs), C14-C17 chloroalkanes, and long-chain chlorinated paraffins (LCCPs), C18-C20 chloroalkanes, would have an impact on the aerospace and defense industry.

The EPA-granted 30 day extension to the comment period did not result in adequate time for a detailed search (AIA requested 90 days). The aerospace and defense industries' global supply chains are complex and we often have little visibility into the chemical content of the products that our suppliers provide. In many cases the suppliers are unaware of what precisely is used in the production of those materials, making identification of specific chemicals difficult.

In addition to asking for more time in the aforementioned letter, further detail was requested from the EPA.



Upon granting a 30-day extension to the comment period, this detail was not provided by the EPA. In order to correctly identify and track the proposed substances, CAS numbers are required. We would need some clarification in order to correctly conduct our review.

- 1) None of the substances from Dover Chemical Corporation have CAS numbers included in this Notice. Two of the substances have PMN numbers; however, these are not broadly used in identification in global commerce.
- 2) The Dover Chemical Corporation “octadecane, chloro derivs” does not have a PMN or CAS number.
- 3) The Dover Chemical Corporation chemical “tetradecane, chloro derivs” is identical to one of the substances from Qualice, LLC; however their PMN numbers differ, and a CAS number is only available for the latter chemical.
- 4) Two of the substances produced from INOVYN Americas, Inc. have different CAS numbers but an identical PMN number.

This clarification would still be important to conduct further investigation, and we would welcome working with the EPA on this in any future rulemaking activity.

Consequent to our internal research and supplier communication on the topic, AIA does have an indication we would be negatively impacted if these materials were restricted. We would likely face challenges both through our suppliers as well as direct use of CPs. As it pertains to the former, we would like to support the comments submitted to the docket on March 18 by the following coalition of trade organizations: Adhesive and Sealant Council, American Chemistry Council, American Wire Producers Association, ACC’s Center for the Polyurethanes Industry, Chlorinated Paraffins Industry Association, Independent Lubricant Manufacturers Association, Industrial Fasteners Institute, Motor and Equipment Manufacturers Association and Vinyl Institute.

We have significant concerns regarding the use of MCCPs and LCCPs in several applications in the process of manufacturing fasteners, such as stainless steel cold fabrication (cold forming, cold heading, and machining); machining threaded bolts; coolants and lubricants in press operations; titanium grinding; and in screw machines, sheet metal forming, and nut-forming operations. The fastener-manufacturing industry suggests it uses MCCPs and LCCPs as an extreme-pressure additive in the metalworking fluids used to create fasteners for aircraft and jet engines, including nuts, bolts, latch pins, and rivets that are manufactured to withstand extreme temperatures, corrosive environments, and stress encountered in flight, while having the lowest possible weight. The fastener industry also suggests there are currently no viable alternatives to MCCPs and LCCPs in metalworking fluids identified for tapping, deep drawing of stainless steel, or titanium grinding – all processes necessary to manufacture these parts.

During this short time, our members have also identified at least five materials potentially containing additional CPs that are installed on aircraft in carpet tapes, cargo liner tapes, tamper proof putties, pinhole fillers, and urethane adhesives. More time and information would be necessary to determine any potential alternatives, if they exist.



Additionally, AIA has found Alkanes, C18-28, chloro, CAS: 85535-86-0, EINECS 287-478-6, Concentration: 0–5% and Chlorinated Paraffin Waxes, CAS: 63449-39-8, EINECS 264-150-0, Concentration: 0–5% which it uses for a moisture barrier coating for aircraft. There are no replacements for this material.

We believe that alternatives for many of these materials are not possible in all uses and, even when alternatives may exist, reformulation, validation and certification (i.e., via customer specification, Department of Defense or other competent authorities requirements) would be a lengthy multi-year process that would cost U.S. industry billions of dollars. We would also urge the EPA to review MCCPs and LCCPs under the TSCA Work Plan program, complete with full public comment and independent external peer review in order to gain some clarity on the impact.

We thank you for your consideration,

Best regards,

A handwritten signature in black ink, appearing to read 'Leslie Riegler', written in a cursive style.

Leslie Riegler
Director of Environmental Policy
Aerospace Industries Association (AIA)