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September 20, 2010

Honorable John Hanger Department of Environmental Protection 16th Floor, Rachel Carson State Office Building 400 Market Street Harrisburg, PA 17101-2301

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Dear Secretary Hanger,

On behalf of the single-ply roofing industry and the member companies of the EPDM Roofing Association, I want to thank you and your staff for the excellent work conducted on the regulations related to commercial and industrial adhesives and sealants in the Commonwealth of Pennsylvania.

The manufacturers, suppliers, and most importantly, the customers of EPDM roofing appreciate the dedicated efforts of the staff at the Department of Environmental Protection to solicit and carefully review the studies on the Pennsylvania ozone season and summary of regulations in other states. Rather than applying a singular, inflexible set of rules and guidelines, your staff had the wisdom to consider regional differences and a full range of options for the optimal solution of a seasonal, phased-in implementation schedule. As a result, the member companies of the EPDM Roofing Association have been afforded the time and resources necessary to focus efforts on developing new, state of the art low-VOC products that our customers can use yearround which will aid in constructing high performance buildings in the state.

From initial meetings in early 2008 to discuss the draft regulations and to fine-tuning the implementation schedule in late 2009, the department's staff provided thoughtful consideration of our industry's concerns. The end result is a stronger and better climate for the entire single-ply roofing industry and their customers in the Commonwealth of Pennsylvania.

Sincerely, Jared O. Blum

Figred O. Blum Executive Director

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Ellen Thorp Associate Executive Director

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