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EPHRATA PRECISION PARTS, INC

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Environmental Quality Board
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JUN 5 2009

RE: Proposed PADEP Rulemaking on Adhesives, Sealants, Primers, and Solvents ENVIRONMENTAL QUALITY BOARD

I am writing on the behalf of my company, Ephrata Precision Parts, Inc., in regards to the proposed PADEP Rulemaking on Adhesives, Sealants, Primers, and Solvents. As a custom molder of polyurethane, my business uses products that will be regulated under the new amendments. I understand that Pennsylvania must amend the existing law to adhere to the new EPA revised 8-hour ozone National Ambient Air Quality Standard. However, Ephrata Precision objects to the wording of the definition for "Metal to urethane/rubber molding or casting adhesive" in section 121.1 of the draft of the proposed rulemaking. The definition reads as follows:

Metal to urethane/rubber molding or casting adhesive—An adhesive intended by the manufacturer to bond metal to high density or elastomeric urethane or molded rubber materials in heater molding or casting processes, to fabricate products like rollers for computer printers or other paper handling equipment.

First, I want to express my confusion over the use of the word "heater" in reference to the molding and casting processes used in polyurethane. In actuality, the business uses *heated* molds and molding since our casting is conducted at high temperatures. Perhaps this is just a typographical error rather than a misunderstanding of the polyurethane business.

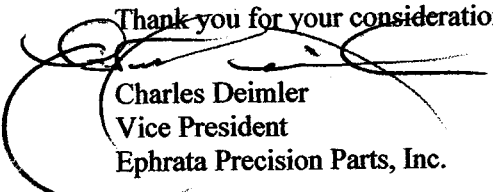
Ephrata Precision's second concern is the qualifier used at the end of the definition: "to fabricate products like. . ." In the definition, it states examples such as "rollers" or "paper making equipment." When urethane is bonded to metal using an adhesive, the finished product is in various forms. My company fabricates and bonds urethane products ranging from rollers to arresting gear for aircraft to missile handling adapters for the military. Therefore, Ephrata Precision feels that the qualifying statement is very narrow regarding the field of urethane to metal bonding practiced in the urethane industry. It should be removed in order to include all applications currently being pursued. This will eliminate any confusion as to what is produced by urethane businesses and to what products the definition refers.

In conclusion, Ephrata Precision proposes amending the definition in section 121.1 to the following:

Metal to urethane/rubber molding or casting adhesive—An adhesive intended by the manufacturer to bond metal to high density or elastomeric urethane or molded rubber materials in heated molding or casting processes, to fabricate products.

In this manner, the typographical error is eliminated and the urethane industry is not misrepresented in the scope of its production.

Thank you for your consideration.


Charles Deimler
Vice President
Ephrata Precision Parts, Inc.

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