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**RE: Reminder: PFAS rulemaking feedback period closing**

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**From** Klemm, Andreas <Andreas.Klemm@spxflow.com>

**Date** Wed 3/25/2026 11:21 AM

**To** Otto, Addison (She/Her/Hers) (MPCA) <Addison.Otto@state.mn.us>

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Good afternoon Addison,

and thank you very much for the opportunity to submit our comments. Indeed, I was unable to access the comments website.

I'm representing a manufacturer of machinery products, predominantly used for processing foodstuff, such as Industrial Pumps, Mixers, Heat Exchanger, Homogenizer, Pasteurizer, Dryer, Valves, etc..

- i. Definition of "Essential for health, safety, or the functioning of society" : . . . such that the unavailability of the PFAS for use in the product would cause the product's service to be unavailable, which would result in . . . We suggest to add "or significantly diminished" after the word "unavailable". Reason : the product's service may still be available but only on a level that is either commercially not viable or technically not sustainable.
- ii. Definition of "Alternative" : . . . would result in a functionally equivalent product. We suggest to replace the word "functionally" with "technically and commercially". Reason : A PFAS material may provide its function over a processing period of 10.000 hours or cycles. A Non-PFAS alternative may provide the same functionality, but only for 100 hours or cycles before it must be replaced by a new component. The function is there but on a level that is commercially not viable.
- iii. "Extreme conditions for use" : Under F. please add abrasion (F. High tear, crack, abrasion, or other stress potential;)

**Andreas J. Klemm, PhD**

Corporate Director Sustainability Reporting

ITT Flow Technologies



240 Fall Street | Seneca Falls, NY 13148

Phone: +1 xxx xxx xxxx | mobile: +49 173 153 0492 | [andreas.klemm@spxflow.com](mailto:andreas.klemm@spxflow.com) | [www.itt.com](http://www.itt.com)

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