

Anonymous Anonymous

Who is commenting? (*choose the best fit*)

Member of the general public

If you represent a product manufacturer or industry group, what industry(ies) do you represent?

HVAC Refrigerant--R454B

Do you have any recommended changes or other considerations that you think the MPCA should take into account when defining the term "alternative"? (*Please review the proposed definitions in the rule concept document prior to answering*)

R454B refrigerant composition is 68.9% R32 and 31% R-1234yf. Doesn't R-1234yf contain PFAS and if so, why not use a pure refrigerant R32, which is used in Daikin, Goodman, and Amana HVAC products

What are the potential ongoing costs to society if the commissioner issues a positive currently unavoidable use determination for the continued use of PFAS within a product or product category? (*For example: environmental, human health, or remediation costs*)
Environmental and human health issues

For manufacturers: Administrative cost of requesting a CUU determination (Part 1 of 2). *Please provide your best estimates or rough orders of magnitude (for example "approx. 200 hours"). Precise accounting data is not necessary to answer this question.*

If your company currently possesses information regarding intentionally added PFAS (to the CAS number level) for all components in your product lines, please estimate the number of technical staff hours that were required to establish this baseline.

Not applicable

For manufacturers: Administrative cost of requesting a CUU determination (Part 2 of 2). *Please provide your best estimates or rough orders of magnitude (for example "approx. 200 hours"). Precise accounting data is not necessary to answer this question.*

If your company does not possess information regarding intentionally added PFAS (to the CAS number level) for all components in your product lines, please estimate the number of technical staff hours needed to obtain this data from your Tier 2 or 3 suppliers for a single

product line.
Not applicable