

Christopher Larsen

Who is commenting? *(choose the best fit)*
Representative of a product manufacturer(s)

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

PTFE (Teflon) is in no way dangerous. Teflon manufacture doesn't even use PFOA anymore. This entire law is made by politicians who don't understand the difference between Teflon and PFOA. Taking some moral judgement on if Teflon should be used in products is ridiculous - you don't even understand what you're trying to ban.

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)*

I think you need to focus on PFOA and other fluorinated surfactants. These are the forever chemicals you care about. Yes, 3M made them by the tanker load, and yes, presumably some leaked. But requiring manufacturers using chemically-inert Teflon tubing that wasn't even made with PFOA to report on ALL of the tubing they have used and making a moral judgement on whether or not it should be allowed in the future makes less than zero sense.

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

Again, what are you trying to do here? Do you even understand?

Should each request for a CUU determination be limited to a single product category, or should applicants be allowed to submit a request for a CUU determination for multiple product categories?

You need to restrict the companies that need to respond to those companies that are MANUFACTURING PFAS, not those that are using Teflon and FKM seals.

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.

More than 500 hours

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.

More than 500 hours

For manufacturers: Expenditure considerations when seeking non-PFAS alternatives (Part 1 of 2). *Please provide your best estimates or rough orders of magnitude (for example "primary cost is CapEx"). Precise accounting data is not necessary to answer this question.*

If you have identified a technically viable non-PFAS alternative for one of your products that contains intentionally added PFAS, does implementing this alternative require Capital Expenditure (such as purchasing new molds, retooling machinery) or primarily Operational Expenditure (such as purchasing more expensive raw materials)?

- Please estimate the ratio of Capital Expenditure to Operational Expenditure (or indicate which category is the dominant cost driver).

It is purely operational. Having engineers define, purchase, test, and iterate with different materials would take thousands of hours.