

Andreas Klemm

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

Representative of a product manufacturer(s)

If you are commenting as a representative, what is the name of the entity you are commenting on behalf of?

I'm representing a manufacturer of machinery products

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

Machinery products predominantly used for processing foodstuff

If you represent a product manufacturer, what types of components, products, or product categories do you manufacture that you will be requesting a CUU determination for?

Industrial Pumps, Mixers, Heat Exchanger, Homogenizer, Pasteurizer, Dryer, Valves, etc.

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)*

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.

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)*

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.

What safety or other standards require the use of PFAS in a product? *(Please include the specific citation)*

“Extreme conditions for use” : Under F. please add abrasion (F. High tear, crack, abrasion, or other stress potential;)

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

Please provide any additional information or documentation needed to support your answers to any of the questions posed.

Note - This comment has been uploaded by the MPCA on behalf of the commenter.

Commenters located outside of the United States are unable to access the comment portal website due to network security. Accommodations were made to accept these comments in an alternative format and upload them on behalf of the commenters.



RE: Reminder: PFAS rulemaking feedback period closing

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>

You don't often get email from andreas.klemm@spxflow.com. [Learn why this is important](#)

This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

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

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