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Superior

TIRE & RUBBER CORP.

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ENVIRONMENTAL QUALITY BOARD

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DEPARTMENT OF ENVIRONMENTAL PROTECTION
REGULATORY REVIEW COMMISSION

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Environmental Quality Board
P.O. Box 8477
Harrisburg, PA 17105-8477

RE: Proposed PADEP Rulemaking on Adhesives, Sealants, Primers, and Solvents, 25 PA. Code Chapter 121

I am writing on behalf of my company, Superior Tire & Rubber Corp., in regards to the proposed PADEP Rulemaking on Adhesives, Sealants, Primers, and Solvents. As a custom molder of polyurethane and rubber, 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, Superior Tire & Rubber Corp. 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 and rubber. 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/rubber business.

Superior Tire & Rubber Corp'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 handling equipment." When urethane or rubber is bonded to metal using adhesive, the finished product is in various forms. My company fabricates and bonds urethane and rubber products ranging from small rollers to large industrial tires. Therefore, Superior Tire & Rubber Corp. feels that the qualifying statement is very narrow regarding the field of urethane/rubber to metal bonding practiced in the urethane/rubber 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/rubber businesses and to what products the definition refers.

In conclusion, Superior Tire & Rubber Corp. 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.

Which eliminates the modifying phrase "like rollers for computer printers or other paper handling equipment" from the definition.

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

Thank you for your consideration.

Larry Sondericker
EHS Manager
Superior Tire & Rubber Corp.