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**RUBBER ROLLS INC.**  
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JUN 5 2009

ENVIRONMENTAL QUALITY BOARD

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

TO: PA. D.E.P. Rulemaking Members:

I am the Technical Director for Rubber Rolls, Inc. We produce both Urethane and Rubber covered rollers for the Metal Industry. We process rolls from 2" outside diameter up to 72" outside diameter and lengths from 1" to 240" overall.

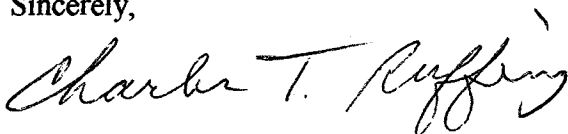
Reviewing your proposed rule that will control VOC content of adhesive, sealants, primers and solvents which include those used by the cast of polyurethane elastomer industry as well as the natural and synthetic polymer industries. My concern is with the proposed definition in section 121.1 for metal to urethane/rubber molding or casting adhesive. The part of the definition that is of concern is the part that states. "An adhesive intended by the manufacture 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.)"

I would like to suggest that first you change the word "HEATER" TO "HEATED" because heat is used in all cases but the source of heat could be hot air ovens, steam or electrically heated molds or steam or electrically heated pressurized autoclaves. Secondly, the word "like" may at some point be possibly interpreted to restrict this definition to only "rollers for computer printers or other paper handling equipment. I would therefore ask that the word like be eliminated from the definition and for clarity purposes. The definition of "Metal to urethane rubber molding or casting adhesive would reads as follows:

"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.

Thank you for your consideration in this matter.

Sincerely,



Charles T. Ruffing  
Technical Director

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INDEPENDENT REGULATORY  
COMMISSION