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April 10, 2002

Document Control Office (7407M)
Office of Pollution Prevention and Toxics (OPPT)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460



Re: Docket Control No. OPPTS-50639

The Boeing Company submits the following comments in response to the Environmental Protection Agency (EPA)'s Perfluoroalkyl Sulfonates (PFAS): Proposed Significant New Use Rule. Supplemental Proposed Rule, published in the Federal Register on March 11, 2002 (67 Fed. Reg. 11014). Boeing manufactures commercial and military aircraft, helicopters, missiles, rockets, spacecraft and related components and equipment. Our company currently employs approximately 180,000 workers at 70 facilities in 27 states.

We are writing in support of EPA's proposal to exclude from the definition of significant new use (1) the manufacture or import of certain PFAS chemicals for use as an anti-erosion additive (i.e., FC-95 and FC-98) in fire-resistant phosphate ester aviation hydraulic fluids; and (2) the use of these PFAS chemicals as intermediates to produce other chemicals used solely for the excluded aviation hydraulic uses.

The use of these PFAS chemicals is critical to the aviation industry. Boeing appreciates EPA's willingness to address our concerns, given the vital anti-erosive properties of the PFAS chemicals, the small quantities used to manufacture and deliver Boeing aircraft, the absence of any alternative materials, and the minimal risk of exposure to humans and the environment.

Sincerely,

Matthew C. Frank

Matthew Frank
Director, Federal Safety, Health
and Environmental Affairs

cc: Mary F. Dominiak

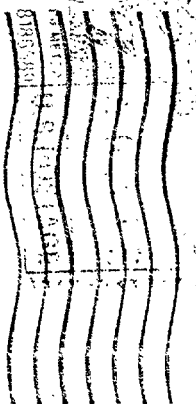
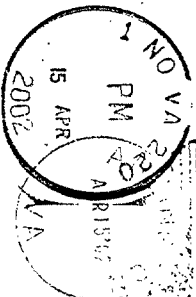
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