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Michael Thompson
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ExxonMobil

C2-004
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April 18, 2002

Docket Control Number **OPPTS-50639C**; Perfluoroalkyl Sulfonates
Proposed Significant New Use Rule; 67FR11014-11030; March 11, 2002

02EMBSI 214

Document Control Office (7407M)
Office of Pollution Prevention and Toxics (OPPT)
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

2002 MAY -9 AM 6:18
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Dear Sir/Madam:

I am writing on behalf of ExxonMobil Oil Corporation (ExxonMobil). ExxonMobil manufactures fire resistant aviation hydraulic fluids containing trace amounts of certain perfluorooctyl sulfonates (PFOS) identified in the subject proposed Significant New Use Rule (SNUR). Our industry has previously provided EPA with pertinent information as to the low volume and critical use of these substances in these hydraulic fluids.

We support the Agency's language in the March 11, 2002 proposed SNUR that will exempt from the SNUR PFOS chemicals when they are manufactured or imported for use as an anti-erosion additive, or as an intermediate to manufacture such additives, in fire-resistant phosphate ester aviation hydraulic fluids.

Sincerely,



R. T. Plutnick

RTP/

CONTAIN NO CBI