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April 3, 2002

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

Dear Sir/Madam:

Solutia Inc. is a manufacturer and marketer of fire resistant airline hydraulic fluids that contain small quantities of substances identified in the subject proposed Significant New Use Rule (SNUR). We have previously provided EPA with pertinent information as to the low volume, critical use of these substances in our hydraulic fluids. We support the Agency's language as proposed in the SNUR that will permit continued use of certain SNUR chemicals as an anti-erosion additive, or as an intermediate to manufacture such additives, for use in fire-resistant phosphate ester aviation hydraulic fluids.

The Agency is to be complimented for developing a proposal that balances the environmental and public health needs to control the SNUR chemicals with the public safety need to provide uninterrupted safe aircraft operation.

Sincerely,

James E. Downes  
Product Stewardship  
Industrial Products  
Solutia Inc.  
PO Box 66760  
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