

From: [Graham, Tom](#)
To: [DEP, PFASProducts](#)
Subject: FW: Comment on Chapter 90: Products Containing Perfluoroalkyl and Polyfluoroalkyl Substances
Date: Thursday, January 23, 2025 9:27:45 AM

From: BParris@seweurodrive.com <BParris@seweurodrive.com>
Sent: Thursday, January 23, 2025 8:55 AM
To: DEP Rule Comments <RuleComments.DEP@maine.gov>
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Subject: Comment on Chapter 90: Products Containing Perfluoroalkyl and Polyfluoroalkyl Substances

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To Whom it may Concern,

[SEW-Eurodrive, Inc.](#) is a global manufacturer of industrial power transmission products - primarily enclosed gearing, electric motors, and electronic motor controls. We do not sell products in the consumer market and our products generally are not reaching consumers. Instead, these products are used in machinery and equipment in manufacturing, logistics and other such industrial environments.

The exemptions enumerated in the draft rulemaking of Chapter 90 Section 4A seem to focus concern primarily on consumer exposure to PFAS. Of interest to our company are points (12) and (13) of section 4A where non-consumer electronics and laboratory equipment as well as items used in the manufacture of other exempted items are themselves exempted. This provides an exemption for a large portion of our product. There is a concern with larger products in our portfolio that, while not necessarily used to manufacture exempted items and not by definition electronic nonetheless pose no greater risk to consumers than our smaller products that are exempt. We would like clarification as to the intention of the rule in regards to such products and whether we can consider all of our products exempt on the basis that they all exist and operate in similar environments isolated from common exposure by the general public.

Best regards,
Billy Parris
Corporate Engineering Manager



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