



## VIA ELECTRONIC FILING

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Office of Pollution Prevention and Toxics (OPPT)  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460-0001

**Re: Comments Concerning EPA's Proposed Significant New Use  
Rules For Certain Nonylphenols and Nonylphenol Ethoxylates  
(Docket ID number: EPA-HQ-OPPT-2007-0490)**

To Whom It May Concern:

I write on behalf of the Boeing Company to provide comments on Docket Identification Number EPA-HQ-OPPT-2007-0490, Certain Nonylphenols and Nonylphenol Ethoxylates; Significant New Use Rules (published at 79 FR 59186, October 1, 2014). We appreciate the opportunity to provide comments on this important proposal to impose a significant new use rule (SNUR) for 15 nonylphenols (NPs) and nonylphenol ethoxylates (NPEs).

The Boeing Company is the world's largest manufacturer of commercial jetliners and defense, space and security systems. Boeing products and tailored services include commercial and military aircraft, satellites, weapons, electronic and defense systems, launch systems, advanced information and communication systems, and performance-based logistics and training. Boeing employs more than 171,000 people across all 50 U.S. states and in 70 countries, with major manufacturing operations in eight U.S. states. As a top U.S. exporter, Boeing has customers in more than 150 countries around the world, and supports airlines and U.S. and allied government customers in more than 90 countries.

The Agency is proposing to designate as a significant new use (1) any use of the 13 NPs and NPEs listed in Table 1 of Unit II.A. of the proposal, and

(2) any use other than use as an intermediate or use as an epoxy cure catalyst of the 2 additional NPs listed in Table 2 of Unit II.A of the proposal. This proposed SNUR is intended to apply to uses that are not ongoing at the time of this proposed rule. Uses not ongoing at the time of the proposal would be designated significant new uses under a final SNUR. EPA is seeking comment on the commercial production of linear forms of NPs and NPEs, as well as any ongoing uses of these chemical substances that the Agency may be unaware of.

Boeing believes that EPA has not adequately accounted for many ongoing uses of some of the listed NPs and NPEs in the aerospace industry. In particular, based on review of our current material specifications and chemical product inventory, Boeing has identified the ongoing use of five NP/NPEs in six functional categories. These ongoing uses are listed in the table below by functional category, definition of use, and Chemical Abstract Service number. Boeing did not explore the use of NPs and/or NPEs in our supplier designed parts, therefore there may be additional aerospace uses not captured within our comments.

Category	Use Definition	Applicable CAS #s
Cleaner Surfactant (NPE)	The compound is used in a heavy duty or mild industrial cleaner to lower the surface tension and aid in the removal of oils, paints, and other contaminants from surfaces.	9016-45-9, 26027-38-3,
Cleaner (NP)	The compound is used in a cleaning formulation as an emulsifier.	104-40-5, 25154-52-3,
Epoxy Cure	The compound is used in an epoxy mixture to promote or control the curing reaction	25154-52-3, 84852-15-3
Adhesive and Resin Cure	The compound is used in an adhesive or resin other than an epoxy (e.g. polyurethane, cyanate ester) to promote or control speed of the curing reaction.	25154-52-3, 84852-15-3
Inks & Colorants	The compound is used in screen printing inks for solubility and emulsification. These inks and colorants are used on markers, instrument panels, metal and plastic appliques, and anodized parts.	9016-45-9
Wetting agent/Surfactant	The compound is used in a chemical mixture to lower the surface tension allowing easier spreading. Such as coolants and dye penetrants, leak detection fluids, oils, lubricants and coatings.	9016-45-9, 26027-38-3,

Given, that these forms of NPs and NPEs are currently being used in the aerospace industry, Boeing requests the Agency revise the proposed Significant New Use Rules For Certain Nonylphenols and Nonylphenol Ethoxylates to exclude these chemicals and categories of use from the proposed significant new use designation.

The Boeing Company appreciates this opportunity to comment on the proposed Significant New Use Rules for Certain Nonylphenols and Nonylphenol Ethoxylates.

Sincerely,



Edward L. Ferguson  
Director,  
Environment & Energy  
The Boeing Company