

To Whom It May Concern:

While our company understands the intent of the Proposed Amendments to Article 6, as a manufacturer of geothermal heat pumps, we find that these new regulations may impose quite a financial burden on our company.

Hundreds of components are used in the manufacturing of our product. Obtaining the correct information from vendors has proven difficult, and in some instances, impossible. Without a chemical composition breakdown, we cannot determine whether any of the chemicals are listed and whether they are above the NSRL or MADL safe harbor levels.

It would then be our responsibility to send these components in to a third-party lab for additional testing. The cost and time involved in this will quickly add up. It may even prove to take longer than the proposed transition time (one year).

We recommend allowing the use of a generic warning (like the short-form warning even on larger appliances). In this way, if we know one of the listed chemicals is in our product, but not to what extent, we can avoid costly testing. Otherwise, the entire regulation should be removed from Title 27.