

January 27, 2017

Tyler Lloyd  
Document Control Office (7407M)  
Office of Pollution Prevention and Toxics  
Environmental Protection Agency  
1200 Pennsylvania Ave. NW.  
Washington, DC 20460-0001  
ATTN: Docket ID EPA-HQ-OPPT-2015-0387

RE: Proposed Significant New Use Rule for N-ethylpyrrolidone and N-isopropylpyrrolidone  
(Submitted Electronically)

Dear Mr. Lloyd:

The Association of Global Automakers, Inc.<sup>1</sup> (Global Automakers) appreciates the opportunity to provide comments on the U.S. Environmental Protection Agency's (EPA) proposed Significant New Use Rule (SNUR) for two alkylypyrrolidones, N-ethylpyrrolidone (NEP) and N-isopropylpyrrolidone (NiPP) [81 FR 85472, November 28, 2016].

Global Automakers and its members support the development and use of the safest chemicals and products available for use in the automotive industry. Through the application of green chemistry principles and sound scientific methods, Global Automakers believes the design and development of new chemistries and technologies will continue to provide innovative solutions to current and emerging environmental challenges. Our goal is to ensure that our members can provide high quality, environmentally sound, and safe products and services.

EPA is proposing to classify significant new uses for NiPP and NEP as any use of NiPP and any use of NEP, except for the ongoing uses as a reactant, in silicone seal remover, coatings, consumer and commercial paint primer, and adhesives. EPA believes these uses are not ongoing at the time this rule was proposed but seeks information regarding ongoing uses. The proposed SNUR, however, is silent on the treatment of articles and the article exemption.

Our members have identified a small number of minor uses associated with articles based on the CAS numbers provided in the proposal. Our understanding is that this proposed SNUR does not cover articles,

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<sup>1</sup> The Association of Global Automakers represents international motor vehicle manufacturers, original equipment suppliers, and other automotive-related trade associations. Global Automakers works with industry leaders, legislators, regulators, and other stakeholders in the United States to create public policies that improve motor vehicle safety, encourage technological innovation, and protect our planet. Our goal is to foster an open and competitive automotive marketplace that encourages investment, job growth, and development of vehicles that can enhance Americans' quality of life. Our members' share of sales and production in the United States is nearly 45 percent and growing. For more information, visit [www.globalautomakers.org](http://www.globalautomakers.org).



and therefore these uses would not be covered if this SNUR were to become final. We recommend that EPA clarify this exemption in the final rule.

In addition, we request that EPA give careful consideration to replacement parts and provide a safe harbor provision in the final rule for replacement parts to be able to clear the channels of trade. We would recommend a ten-year sell down time for that provision to be effective.

We thank you for the opportunity to provide comments on this proposal and are available to discuss these comments further at any time.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Rege".

Julia M. Rege  
Director, Environment & Energy  
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jrege@globalacutomakers.org