To: Beck, Nancy[Beck.Nancy@epa.gov]
From: Culleen, Lawrence E.
Sent: Wed 6/7/2017 3:29:09 PM
Subject: meeting request

Nancy –

I am interested in setting up a meeting with you concerning the proposed TSCA paint stripper rule. We represent W.M. Barr & Company, an employee-owned small business that is the country's largest producer of consumer-use paint strippers that contain methylene chloride and which are sold in retail centers and home & hardware stores nation-wide. We have submitted detailed comments on the proposed Section 6(a) paint strippers regulation which, as you may know, will effectively ban Barr's retail-size paint strippers on the basis of certain assumptions and conclusions that we do not believe are scientifically supported by the record.

Barr's President has asked me to approach you directly because the CEO and one or more members of the company's Board of Directors intend to travel to Washington so they can make you personally aware of the jeopardy their enterprise faces if the rule if finalized as proposed. The Agency's economic assessment greatly underestimates the impacts the rule will have on Barr and other small businesses that formulate paint strippers and the many thousands of small business residential remodeler/contractors that rely on retail-size paint strippers containing methylene chloride. Unfortunately, Agency staff have erroneously concluded that there are technically and economically feasible alternatives to methylene chloride paint stripers which information in the public literature (and data Barr has provided to EPA staff) contradict.

I intend to reach out today to your scheduler to try to arrange such a meeting the week of July 10 or 17th. However, I want you to feel free to contact me directly to confer further about the purpose of our meeting and the substantive aspects of the comments Barr timely submitted during the public comment period.

Thank you in advance for your consideration and any assistance you can provide in setting up such a meeting.

Larry

Lawrence E. Culleen
Partner

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