

Message

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**From:** Deziel, Dennis (DR) [DRDeziel@dow.com]  
**Sent:** 2/16/2018 3:41:43 PM  
**To:** Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]  
**Subject:** FW: Non-Order SNUR  
**Flag:** Follow up

I am getting pressure internally due to the EPA silence on this. Can you help?

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**From:** Deziel, Dennis (DR)  
**Sent:** Tuesday, February 13, 2018 10:31 AM  
**To:** Mottley, Tanya <mottley.tanya@epa.gov>  
**Subject:** RE: Non-Order SNUR

Resending ☺

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**From:** Deziel, Dennis (DR)  
**Sent:** Thursday, February 08, 2018 7:55 AM  
**To:** Mottley, Tanya <mottley.tanya@epa.gov>  
**Subject:** Re: Non-Order SNUR

Tanya,

Our PMN case was submitted in November 2016 and EPA completed its review in July 2017, however the PMN case remains open. With the uncertainty around the publication of the non-Order SNURs, is EPA willing to consider issuing a 5(e) Consent Order with testing pended and a “may present” determination? While we prefer the non-Order SNUR route, at this point, we need to consider what may present the most expeditious route to commercialization.

Thank you, Dennis

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**From:** Mottley, Tanya <mottley.tanya@epa.gov>  
**Sent:** Tuesday, February 6, 2018 3:41 PM  
**Subject:** RE: Non-Order SNUR  
**To:** Deziel, Dennis (DR) <drdeziel@dow.com>

Hi Dennis, and thanks for your message. I think publication this week or next week is unlikely. The document hasn't left EPA yet for publication by the Office of the Federal Register, and is still going through EPA management review. Given that this is the first of these documents we're trying to publish, the review period has become rather lengthy (and as such, less predictable). I'm not in the office until Thursday of this week (I'm on travel now), but when I'm back at work, I'll check on where it is in the review process.

At this point, I'm reluctant to tell you a target publication timeframe. Hopefully it would be before the end of this month, but I can't say for certain.

Tanya

Tanya Hodge Mottley

Acting Deputy Director of Programs  
Office of Pollution Prevention and Toxics, OCSPP  
(202) 564-3152

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**From:** Deziel, Dennis (DR) [<mailto:DRDeziel@dow.com>]  
**Sent:** Tuesday, February 06, 2018 3:35 PM  
**To:** Mottley, Tanya <[Mottley.Tanya@epa.gov](mailto:Mottley.Tanya@epa.gov)>  
**Subject:** Non-Order SNUR

Hi Tanya,

Still looking like this week for publishing? Thanks!

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