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**From:** Culleen, Lawrence E. [Lawrence.Culleen@apks.com]  
**Sent:** 7/13/2017 5:23:03 PM  
**To:** Culleen, Lawrence E. [Lawrence.Culleen@apks.com]; Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]  
**CC:** Ringel, Aaron [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=1654bdc951284a6d899a418a89fb0abf-Ringel, Aar]; Louer, Greg [Greg.Louer@apks.com]  
**Subject:** RE: thank you and additional material attached

Thank you for checking.

Yes, we included the 2017 Report among the half-dozen expert reports attached to our written comments. Both electronic and hard copies were timely submitted.

Of course, we would be happy to email or messenger over copies of the set of comments and reports if it would help enable access and future discussions.

We appreciate your interest.

Larry

-----Original Message-----

**From:** Beck, Nancy [Beck.Nancy@epa.gov]  
**Received:** Thursday, 13 Jul 2017, 7:37AM  
**To:** Culleen, Lawrence E. [Lawrence.Culleen@apks.com]  
**CC:** Ringel, Aaron [ringel.aaron@epa.gov]; Louer, Greg [Greg.Louer@apks.com]  
**Subject:** RE: thank you and additional material attached

Thank you Larry.

Is this 2017 report in the docket or is it something we should make sure we add?

Regards,  
Nancy

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Nancy B. Beck, Ph.D., DABT  
Deputy Assistant Administrator, OCSPP  
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**From:** Culleen, Lawrence E. [mailto:Lawrence.Culleen@apks.com]  
**Sent:** Wednesday, July 12, 2017 7:08 PM  
**To:** Beck, Nancy <Beck.Nancy@epa.gov>  
**Cc:** Ringel, Aaron <ringel.aaron@epa.gov>; Louer, Greg <Greg.Louer@apks.com>  
**Subject:** thank you and additional material attached

Nancy and Aaron –

Thank you again for meeting with us today. We found the session to be extremely helpful. We will be following up in August with Joel for a more “in depth” session with CCD and the pertinent technical staff with whom we will focus more specifically on some of the “science aspects” of the comments, EPA’s risk and economic assessments, and the data WM Barr provided to the Agency with its comments.

In the meantime, because a great deal of the discussion today focused on the lack of technically and economically feasible alternatives to MeCl<sub>2</sub> paint strippers, we are sharing with you the attached copy of the Report prepared by Barr Brands personnel in 2017. The Report compares the performance of consumer-use paint stripper products available on the retail market today. The efficacy tests were performed in a manner consistent with the industry standard published by ASTM. Barr’s Report also includes an evaluation of alternative formulations that are likely to emerge in the retail (consumer and small business contractor) market if MeCl<sub>2</sub> strippers are no longer available at retail. Some information on the prices of retail-sale paint strippers is reflected in the Report, as is very basic information on the flammability of the various products noted in the Report. Of course, Barr’s public comments and the technical reports we submitted during the comment period explore these and other facets of the rule in greater depth.

Again, thank you for meeting with the delegation from Barr Brands; we appreciate your time and attention to this important matter.

Larry

Lawrence E. Culleen  
Partner

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