

Ms. Faye Graul
Executive Director
HSIA
Washington, DC
fgraul@hsia.org

Dear Ms. Graul,

I am writing to you today on behalf of Tech Met Inc., and its 42 employee owners. Tech Met Inc. is located in Glassport, PA, just outside of Pittsburgh, and is a leading presence in the field of high precision chemical milling for the aerospace, medical and industrial sectors. For well over 20 years, Tech Met has enjoyed a history of environmental responsibility and good corporate citizenship.

The recent notice received regarding potential further restrictions on the use of perchloroethylene (perc) is of great concern to our company, as it represents a significant threat to our ability to compete in our primary field of expertise. The coatings required to operate in this field are very specific, highly specialized, and most pertinently, perc solvated. There are no ready substitutes.

In support of your efforts to bring the current uses and benefits of perc to light, I have provided the requested information on the following page as completely as possible. If I can help further in any way, please do not hesitate to contact me.

Thank you for all of your help in this effort.

Sincerely,

Mike Vidra
President, Tech Met, Inc.
mvidra@techmetinc.com

- Current uses of the solvents:
 - For most of its chem-milling work, Tech Met uses coatings that are formulated with perc as the primary solvent. Additional perc is then used to thin these coatings where applicable, and in some cases, is also used to chemically remove the coatings from finished parts.
- Information on how the solvents are being used
 - Tech Met applies the perc solvated coatings in a dedicated coating application room through dipping parts in a coatings tank, or through airless spraying of the coating on larger parts. These coatings are removed in the desired locations to expose the underlying metal. When exposed to the appropriate chemistry, the exposed metal is dissolved to the prescribed depth, resulting in the desired final geometry and part weight. The perc solvated coatings are the only commercially available coatings that can withstand the chemistries required for the chem-milling processes.
- What types of products contain these solvents
 - Coatings temporarily applied for use in the chem-milling process (see above). Approximately half of all chem-milling work performed by Tech Met requires the use of perc solvated coatings.
- Which industry sectors use the products
 - Aerospace components (military, commercial and space program), medical implants, military (non-aerospace)
- What volume of the chemical is used
 - For calendar year 2016, Tech Met used 27,000 pounds of perc.
- Have any uses been discontinued or phased out
 - Several types of medical implants and aerospace engine components require only very limited exposure times to acid etching solutions, and in these cases, the products have been switched over to other coatings that do not contain perc or other hazardous air pollutants. This is not possible for selective chem-milling on most aerospace and industrial components.
- Any exposure scenarios
 - Tech Met applies the perc solvated coatings in a dedicated, isolated, sealed coating application room that is continuously evacuated through a carbon absorption unit that strips the perc from the air to be reclaimed and re-used. This technology is currently Best Available Control Technology, with exhaust concentrations routinely running less than 1 ppm. Workers are required to wear respirators when in the coating application room.
- Any industrial hygiene data
- Any fugitive emissions data
- Ranges in which the chemical is present in products
 - The coatings containing perc are fully removed after the chem-milling process, so no solvent remains on/in the final product.