

Air Products and Chemicals, Inc.
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September 25, 2020

U.S. Environmental Protection Agency
ATTN: IUR/CDR Submission
tsca-hotline@epamail.epa.gov

Re: 2020 CDR 90-day Extension Request

Dear CDR Submission Staff:

Please allow this letter to serve as a formal request by Air Products and Chemicals, Inc. to extend the deadline for CDR submission for imported mixtures by 90-days to February 28, 2021 (the current deadline is November 30, 2020). The physical import files which contain the information needed to break down mixtures by individual chemical components (i.e. CAS numbers) are stored off-site and present a logistical challenge to retrieve and review in-person because of the COVID-19 pandemic.

Our workforce is currently on business-critical status with all administrative personnel on work from home status due to the global pandemic from COVID-19. From a health and safety perspective, this creates additional logistical barriers for our personnel to review the mentioned files while using all COVID-19 protocols put in place, including:

- Employee training and approval to gain site access
- Self-monitor/self-report (symptoms, close contact within last 14 days)
- Temperature screening
- Social distancing
- Personal protective equipment
- Personal and file cleaning and sanitation

Air Products thanks the EPA for considering this extension request. Air Products strives to maintain regulatory compliance while protecting the health and safety of its employees. This extension would enable Air Products to meet both commitments.

If you require any additional information, please contact either of the undersigned.

Sincerely,

Air Products and Chemicals, Inc.

A handwritten signature in blue ink, appearing to read "Angie M. Frederick".

Angie Frederick, Principal Safety Specialist
smitha22@airproducts.com 610-481-1594

A handwritten signature in blue ink, appearing to read "Brent Koller".

Brent Koller, Senior Environmental Engineer
kollerbd@airproducts.com 610-481-4605