

From: [Melendez, Tanya](#)
To: [DEP Rule Comments](#)
Subject: Comment on Chapter 90: Products Containing Perfluoroalkyl and Polyfluoroalkyl Substances
Date: Friday, March 31, 2023 9:58:19 AM
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PHOENIX manufactures plastics caps and closures, which may be used for a variety of applications ranging from personal care, cosmetics, food, and pharmaceutical applications.

If a product contains PFAS, but the PFAS are not meant to provide, “a specific characteristic, appearance, or quality or ... perform a specific function,” in the manufactured article, would their presence require notification under this new rule? For clarification, the PFAS are used as processing aids by our raw material manufacturers, but once the raw materials are converted into a packaging component, the PFAS are not meant to provide “a specific characteristic, appearance, or quality or ... perform a specific function.”

Are inks considered a packaging component?

Many inks contain PFAS, and the PFAS are intended to perform a specific function in the ink formulation, but once the ink is used for printing, the PFAS are not desired nor intended to provide “a specific characteristic, appearance, or quality or ... perform a specific function,” in the printed manufactured article. Would this use of PFAS require notification under this new rule? Who would be responsible for making the notification, the ink manufacturer, the organizations using the ink for the printing of their packaging components, or both?

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