

**From:** Kim Willson <kim@ruggeriowillson.com>

**Sent:** Monday, June 1, 2020 5:08 PM

**To:** BorinOgden, Lisa (DNREC)

**Subject:** HFC language

Lisa,

Per our discussion, here is the language that is concerning as it relates to R&D activities in Delaware. We do not believe that it is the intent to incorporate these changes for R&D purposes, but wanted to get some clarity from you all. Thank you in advance for your help.

**In Section 3.0, Definitions:**

“Use” means any utilization of any substance, including but not limited to utilization in a ~~manufacturing process or~~ product installed in Delaware, consumption by the end-user in the State of Delaware, or in intermediate applications in the State of Delaware, such as formulation or packaging for other subsequent applications. For the purposes of this regulation, use excludes residential use, but it does not exclude manufacturing for the purpose of residential use.



T: 302-270-2705

M: P.O. Box 1540 | Rehoboth Beach, DE 19971

O: 109 E. Division St. | Dover, DE 19901