

## Silver, Joshua

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**From:** Nick Poole <nick.poole@refsols.com>  
**Sent:** Friday, November 17, 2023 5:35 AM  
**To:** Silver, Joshua  
**Cc:** Peyton, Gwendolyn; Sheppard, Margaret  
**Subject:** Re: EPA SNAP Submission  
**Attachments:** RS-20 SNAP submission WITHOUT CBI.xlsx; RS-20 SNAP submission WITH CBI.xlsx; Incompleteness Letter R-480A 11-06-2023.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

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Hi Joshua,

Attached are updated versions of the submission documents. Regarding the points you raised in the Incompleteness letter (attached for reference) there were a few points that we did not know where to add in the submission document. These are listed below with our answers.

- 1b. We have indicated that RS-20 meets the ASHRAE standard 34 and has been assigned a safety classification of A1 i.e. non-flammable and non-toxic. Is there something additional you require?
- 2b. It is possible of course that the maximum exposure limit of 900 ppm could be reduced with the use of PPE
- 2c. The expected worker exposure is not expected to equal the OEL of RS-20, but we do recommend in our literature that during servicing & installation goggles, protective clothing & respiratory protection is used
- 2d. The expected worker exposure is not expected to equal the OEL of RS-20

Look forward to your reply,  
Best regards,  
Nick Poole

Technical Manager  
Refrigerant Solutions Ltd.

On 6 Nov 2023, at 17:33, Silver, Joshua <Silver.Joshua@epa.gov> wrote:

Hi Nick,

Thanks for confirming receipt and for the question. I suggest revising the submission document, both CBI and non-CBI, where appropriate. You may, alternatively, send a letter on letterhead, with both a CBI version and a non-CBI version, though the first is typically easier since all the information is collated in a pre-arranged format.

Best,  
Josh

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**From:** Nick Poole <[nick.poole@refsols.com](mailto:nick.poole@refsols.com)>  
**Sent:** Monday, November 6, 2023 11:40 AM  
**To:** Silver, Joshua <[Silver.Joshua@epa.gov](mailto:Silver.Joshua@epa.gov)>  
**Cc:** Peyton, Gwendolyn <[Peyton.Gwendolyn@epa.gov](mailto:Peyton.Gwendolyn@epa.gov)>; Sheppard, Margaret <[Sheppard.Margaret@epa.gov](mailto:Sheppard.Margaret@epa.gov)>  
**Subject:** Re: EPA SNAP Submission

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Hi Joshua,

I can confirm receipt of your email. We will update you with answers to your questions as soon as possible. Do you want a reply to your email or to update the SNAP submission document?

Best regards,  
Nick Poole

Technical Manager  
Refrigerant Solutions Ltd.

On 6 Nov 2023, at 16:36, Silver, Joshua <[Silver.Joshua@epa.gov](mailto:Silver.Joshua@epa.gov)> wrote:

Dear Mr. Poole,

For your convenience, please see the attached letter regarding your SNAP submission for R-480A. We reviewed the information you provided on August 2, 2023, and have some additional questions. Please confirm receipt of this email.

Please let me know if you have any questions.

Sincerely,

Joshua Silver  
Policy Analyst  
U.S. Environmental Protection Agency  
Stratospheric Protection Division  
202-564-2473, [Silver.Joshua@EPA.gov](mailto:Silver.Joshua@EPA.gov)  
<Incompleteness Letter R-480A 11-06-2023.pdf>