

September 12, 2024

Mr. Chris Bradley  
Planning, Rule Development and Implementation  
South Coast Air Quality Management District  
21865 Copley Drive, Diamond Bar, CA 91765  
Email: [cbradley@aqmd.gov](mailto:cbradley@aqmd.gov)

Re: Proposed Amended Rule 1151 – Automotive Coatings-- OPPOSE

Dear Mr. Bradley:

Miwon Specialty Chemical Co., Ltd. is involved in the production and distribution of raw materials that are used in ink and coating formulations that are cured by exposure to UV and LED light or an electron beam. Many of our customers have manufacturing facilities in California. We welcome the opportunity to comment on the proposed amendments to Rule 1151 – Automotive Coatings. We appreciate the district's efforts to protect the air, but the current proposal adds a multitude of burdens to our industry and, more importantly, acts as a barrier to the implementation of clean technology. Therefore, we stand opposed to the draft version of the proposed rule.

PAR 1151 treats all coating processes alike, regardless of their environmental benefit. UV/EB/LED processes are not formulated with Volatile Organic Compounds (VOCs) or toxics air contaminants. Conversion away from solvent processes benefits the District and your Board has provided incentives in the form of regulatory flexibility in several other rules such as R219 and most recently R301.

We strongly oppose the new additional requirements for reporting, recordkeeping and labelling, in the latest R1151 proposal. The current Rule 109 requirements cover UV/EB/LED materials and sufficiently provide the district with compliance verification. PAR 1151 imposes a whole host of mandates on businesses, even those outside California, which will not result in any emission reductions. In fact, these additional requirements will deter businesses from investing in clean technologies like UV/EB/LED. Businesses who are willing to invest in clean technologies should be encouraged to do so and saddling them with added regulatory costs will be counterproductive to the district's mission. Thus, we urge the district to:

**Provide exemptions for UV/EB/LED materials from section (g) Recordkeeping Requirements and section (h) Administrative and Reporting Requirements for Automotive Coating Manufacturers.**

We hope we can continue to work with staff to add language that would remedy the harm being done to businesses in the South Coast who are looking to convert to UV/EB/LED processes thereby giving the district emission reductions above and beyond those currently required in R1151.

Sincerely,

Paul Elias

Director

Miwon Specialty Chemical USA