September 13, 2024

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

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

Dear Mr. Bradley:

RadTech International is pleased to comment on the proposed amendments to Rule 1151—Automotive Coatings. RadTech is the premier trade association in North America for Ultraviolet/Electron Beam/Light Emitting Diode (UV/EB/LED) technology. We speak on behalf of our over 800 members who are involved in a myriad of industry sectors ranging from printing and packaging to nail polish. UV/EB/LED materials are also used in the Automotive Coatings industry in applications such as hard coat repair for polycarbonate headlight lenses. (please see attached June 2024 article published in the UV+EB Magazine).

UV/EB/LED processes are all electric, eliminating the need for add-on control devices thereby preventing emissions of criteria pollutants (Nitrogen Oxides) and Greenhouse Gases. Our products are not formulated with conventional solvents and therefore the emissions of Volatile Organic Contaminants (VOCs) are negligible. Energy curable materials are free of toxic materials and are considered "super-compliant" as they go above and beyond current rule requirements and provide the district with excess emission reductions. Transitioning to these cleaner materials help the district achieve its clean air goals.

Unfortunately, we cannot support the current rule proposal as it needlessly saddles our industry with burdensome requirements that do not result in any benefit to air quality. On the contrary, these overly prescriptive requirements act as a barrier to the implementation of clean technology. We urge the district to provide incentives in the form of regulatory flexibility, to companies who invest in UV/EB/LED technology. Our suggested changes are as follows:

Request for Exemption

As mentioned during the public workshop, RadTech urges the district to provide regulatory flexibility to UV/EB/LED processes. Our materials are typically well below 50 grams/liter in VOC content which is minimal compared to the proposed limits, some as high as 840 grams/liter. While it may make regulatory sense to scrutinize high VOC materials, it simply does not make sense to subject companies who are investing in clean air technology to the same level of scrutiny. In keeping with past district policies and direction from the Governing Board, we respectfully request that UV/EB/LED materials be exempted from the rule requirements Any relief from administrative burdens will amount to incentives for businesses to voluntarily choose UV/EB/LED technology.

We strongly oppose the new additional requirements for reporting, recordkeeping and labeling 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 creates 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 with added regulatory costs will be counterproductive to the District's mission.

We ask the district to p**rovide exemptions for UV/EB/LED materials from section (g) Recordkeeping Requirements and section (h) Administrative and Reporting Requirements for Automotive Coating Manufacturers.**

Request for Definition

We very much appreciate the inclusion of a definition for energy curable materials in various source specific rules in past rulemakings. Unfortunately, PAR 1151 lacks any mention of energy curable materials which can cause confusion and uncertainty in the regulated community. The rule should be technology neutral and include definitions for all available compliant technologies. We would very much appreciate the inclusion of a definition for energy curable materials in the rule. We propose adding the following definition:

ENERGY CURABLE MATERIALS are single component reactive products that cure upon exposure to visible-light, ultraviolet light, or to an electron beam.

Test Method

The Environmental Protection Agency and the SCAQMD have long recognized that EPA Method 24 is not suitable for thin film UV/EB/LED Materials. The Multiple Test Method Section of the rule is problematic in that it acts as a "gotcha" to businesses who may be subject to fines by the district due to lack of clarity on which method to employ. Thus, RadTech urges the inclusion of ASTM D7767-11 as suitable test method for UV/EB/LED Automotive Coatings. We propose the following language:

The VOC content of thin film Energy Curable Adhesives and Sealants may be determined by manufacturers using ASTM Test Method 7767-- Standard Test Method to Measure Volatiles from Radiation Curable Acrylate Monomers, Oligomers, and Blends and Thin Coatings Made from Them.

Transfer Efficiency

We request an exemption from the transfer efficiency requirements of the rule, for high viscosity (above 650 cps) materials. This request is consistent with the exemption in Rule 1106—Marine Coatings, adopted by the Board. Flexibility should be offered to UV/EB processes as related to the requirements for transfer efficiency in the rule. We suggest the following language

The provisions of paragraph (d)(7) shall not apply to marine or pleasure craft coatings with a viscosity of 650 centipoise or greater, as applied.

UV/EB materials not only meet but far exceed any proposed rule requirements and any added flexibility to companies that choose these pollution preventive processes will encourage voluntary emission reductions thereby furthering the district's mission. We appreciate your attention to this matter and look forward to a productive rulemaking process.

Sincerely,

Rita M. Loof
Director, Environmental Affairs

Cc: SCAQMD Board