

Comment Letter #97



October 18th, 2022

Michael Krause
Assistant Deputy Executive Officer
South Coast Air Quality Management District
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Re: Public Comments on Revised Draft 2022 Air Quality Management Plan (AQMP)

RadTech International 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. RadTech has been participating in the AQMP development, serving as a member of the advisory committee for over a decade. In that capacity, we have made comments on the Draft 2022 AQMP and accompanying Policy Briefs and are pleased to provide additional comments on the Revised Draft. We appreciate the responses to our previous comments, provided by staff, especially the additional information included about UV/EB/LED processes in Control Measure CTS-01.

CTS-01 --Further Emission Reductions from Coatings, Solvents, Adhesives, and Lubricants [VOCs] / FLX-02 Stationary Source VOC Incentives [VOCs]

We appreciate the district's consideration of UV/EB/LED technology as one of the potential ways to achieve VOC reductions and are strongly support the proposal to incentivize the use of zero and near-zero VOC materials. To that end, we appreciate the commitment to amend the district's permit exemption rule (Rule 219) to remove regulatory barriers to implementation of low VOC (less than 50 grams/liter in VOC content) materials. Most UV/EB/LED materials emit little to no VOCs or Hazardous Air Pollutants without relying on toxic materials. Since the materials do not "dry" (cure) unless exposed to energy, there is less clean-up. UV/EB users enjoy an increase in up-time and productivity due to the nature of the chemistry (doesn't skin over in applicator, not clean up between shifts/weekends, faster start-ups).

Removing overly prescriptive permitting and recordkeeping requirements would help the district achieve its incentives goals under Control Measure FLX-02. While we wholeheartedly agree with the incentives concept, we are concerned with how it would be implemented by requiring facilities to "accept permit conditions". Embroiling facilities in the permitting system and

demanding acceptance of permit conditions, would defeat the purpose of an incentives program as facilities will not see costly permit modifications as an incentive. We very much support the provision of incentive funding to facilitate the adoption of clean, low VOC emission technologies from stationary sources and believe that eliminating permit fees via permit exemptions would indeed be an incentive.

STATE & FEDERAL CONTROL MEASURES [Ch.4; p.34]

RadTech urges the district to play an active role in supporting the State Implementation Strategy previously adopted by the Environmental Protection Agency. Our Association was disheartened to learn of the Environmental Protection Agency's (EPA) proposed disapproval of Rule 1106 (Marine Coatings) and Rule 1107 (Metal Coatings). This proposed action damages the district's efforts to expand the use of low Volatile Organic Compound (VOC) materials by introducing greater uncertainty. We urge the district to support past decisions of its Governing Board and oppose EPA's proposed disapproval of Rule 1106 and Rule 1107.

RULE COMPLIANCE AND TEST METHODS [APPENDIX IV-A-167]

Decades ago, both the EPA and the SCAQMD acknowledged that EPA Method 24 – used for solvent borne materials—was not suitable for thin film energy curable materials. The emissions from energy curable materials were so miniscule that the standard method used for conventional coatings could not accurately measure the emissions of Volatile Organic Compounds (VOCs). The agencies approached our industry and requested that we develop a test method. We received assurances from SCAQMD that an ASTM test method would be acceptable. We then embarked on an effort which, lasted over thirty years, to develop ASTM D7767-11 “Standard Test Method to Measure Volatiles from Radiation Curable Acrylate Monomers, Oligomers and Blends and Thin Coatings Made from Them.” The method was included in the district's Graphic Arts Rule (Rule 1130); approved by the California Air Resources Board (CARB) and ultimately approved by the EPA.

EPA has not proposed any alternative test method to our industry or explained a proposed limited disapproval of SCAQMD's rules on the basis that ASTM D7767-11 is not enforceable because it is not EPA approved. The proposed action would be detrimental to our industry and leave businesses in regulatory limbo as we would not have a method to verify the VOC content of our materials thereby undermining the district's efforts to obtain “quantifiable emission reductions” as outlined in the Revised Draft [Ch. 4.; p. 79]. Furthermore, this action undermines the goal of the Clean Air Act as it puts hurdles in the way of a super-compliant all electric technology only because its emissions are too low to measure by conventional test methods. The proposed action also further hampers the SCAQMD as it attempts to attain federal Ozone standards.

SCAQMD staff routinely informs their Governing Board and the public that EPA has not done its fair share of regulating mobile sources and points to that failure as one of the main reasons the South Coast Basin is not in attainment. We ask the district to support our efforts to obtain EPA approval of ASTM D7767-11.

We appreciate the opportunity to serve on the AQMP Advisory Committee and the consideration of our comments. RadTech looks forward to the development of the AQMP.

Sincerely,

Rita M. Loof
Director, Environmental Affairs

Cc: Wayne Nastri, Sarah Reese, SCAQMD Board