



March 17, 2022

Mr. Paul Rodriguez
Assistant Air Quality Specialist
South Coast Air Quality Management District
prodriguez@aqmd.gov

Re: Public Comments Preliminary Draft Community Emissions Reduction Plan (CERP)
South Los Angeles

Dear Mr. Rodrigues:

RadTech participated in the most recent CERP workshop and is pleased to comment on the Preliminary Draft. Our Association represents over 800 members involved in Ultraviolet/Electron Beam/Light Emitting Diode (UV/EB/LED) technology. Our processes are all electric environmentally friendly that do not require add-on controls, thereby eliminating combustion contaminants and Greenhouse gases. Additionally, our sister association-- the International Ultraviolet Association Inc. (IUVA)—represents the disinfection industry and can play a pivotal role in air filtration projects that are currently part of AB 617.

Our specific comments follow:

Chapter 2: Community Outreach, Community Steering Committee, and Public Process

The draft CERP recognizes that community engagement is essential to the success of the CERP and the AB 617 program as a whole. We would propose enhancing the existing outreach efforts by providing a resource page on the AB617 web page that would include links to industry trade associations such as ours and the International Ultraviolet Association Inc. (IUVA). Many businesses feel more comfortable requesting information about conversion to less polluting processes from non-regulatory agencies such as RadTech and IUVA. The district's website currently includes a list of resources to private providers and it is our hope that this approach can be extended to RadTech and IUVA.

We would also urge the district to convene a conference to discuss alternatives to polluting processes. Our member companies are experts in their field and would welcome such partnership.

Chapter 5a: Introduction to Actions to Reduce Community Air Pollution

As stated during the public workshop, district rules can act as barriers to the implementation of cleaner technologies such as UV/EB/LED. We urge the district to provide incentives for facilities to produce emission reductions above and beyond what is required by district rules. We believe providing exemptions from permits for processes such as ours which exceed rule limits, is a path for further reductions of emissions and exposure and would be a way to address the community's concerns.

Chapter 5b: Mobile Sources

One of the CERP's goals is to work with local school districts and CSC members to identify and prioritize schools for air filtration systems. UV-C disinfection systems can enhance current air filtration system by eliminating bacteria, viruses and pathogens from indoor air in school settings. This would reduce school absences, hospital visits and improve public health overall. We urge the inclusion of UV-C germicidal units in the air filtration goals of the CERP.

Chapter 5d: General Industrial Facilities

We suggest establishing financial incentive programs—similar to the one for dry cleaners—to assist industrial facilities in making an early transition to non-polluting alternative technologies. The Community Steering Committee (CSC) has stressed the importance of outreach and training to industrial facilities regarding green alternatives and any financial and technical support to aid in the transition to green technologies. We urge the district to consider UV/EB/LED technology as part of the solution.

We would welcome a conversation to discuss these issues in more detail and look forward to the CERP development process.

Sincerely,

Rita M. Loof
Director, Environmental Affairs

Cc: btolliver@aqmd.gov; rivera@aqmd.gov; khiggins@aqmd.gov; wnastri@aqmd.gov