

Hughes Bros. Aircrafters

I N C O R P O R A T E D

4/13/2020

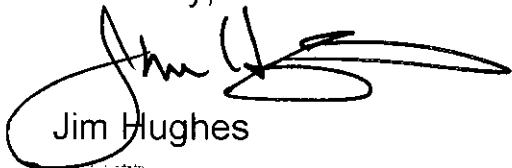
Dear Mr. Morris,

Thank you for allowing Hughes Bros. Aircrafters (Hughes Bros.) to submit the following comment on Proposed Rule 1147.2. We have been in operation since 1947, and we strive to be at the forefront in the manufacture of precision airframe sheet metal details and assemblies. Since our inception, Hughes Bros. has been under the same ownership at the same location within the Los Angeles Mid-Alameda Corridor Enterprise zone. We are a woman-owned small business with a facility covering 65,000 sq. ft and we employ over 45 employees. This foundation and longevity has and continues to provide our customers the confidence that every product that we manufacture is the best quality possible.

We express concern over the possible revision of emission limits for NOx emissions, specifically for the burners on our zinc pot melting furnaces. The burners installed on these furnaces are specifically designed for these furnaces so retro-fitting burners to existing melting furnaces is not a trivial task. We have been contacting vendors with little success in finding any vendor willing to provide us a quote for lower emitting NOx burners. I wanted to share with you a message from one of our vendors regarding this problem (attached to this letter). They indicated that the manufacturers are having difficulties finding the proper equipment to meet the requirements for the existing rule 1147. The vendor even went on to say that they stopped pursuing business for equipment required to meet existing rule 1147.

Again Hughes Bros. appreciates this opportunity to provide comment on Proposed Rule 1147.2. We are hopeful that our comments can provide SCAQMD further insight to the technological limitations in the development of Proposed Rule 1147.2.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Hughes", with a large, sweeping flourish extending to the right.

Jim Hughes

Vice President, Hughes Bros. Aircrafters, Inc.