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 REDONDO BEACH, CA
 90277
 USA
UV SINCE 1987

UV CURING SYSTEMS
 3D UV CURING SYSTEMS
 UV RADIOMETERS
 CORONA TREATERS
 FLAME TREATERS
 XYZ DISPENSING
 IR SYSTEMS

LASER MARKING EQUIPMENT
 NON-VACUUM PLASMA TREATMENT
 HYDROPHYLIC MEDICAL COATING SYSTEMS
 UV LED SYSTEMS
 3D UV CURE CHAMBERS
 UV DISINFECTION
 UV RENTAL SYSTEMS

September 12, 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: Proposed Amended Rule 1151 – Automotive Coatings-- OPPOSE

Dear Mr. Bradley:

DDU Enterprises, Inc is involved in UV, Surface treatment and other clean air manufacturing technologies serving many California manufacturers up and down the state for over 33 years. 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 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 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. 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 Yours,

DS DeLong

Douglas S. DeLong
 DDU Enterprises, Inc.