

To Whom It May Concern,

In response to the request by the SCAQMD for written submissions to be submitted by today:

Our experience with earlier implementations of the 1107 Rule changes was nothing short of catastrophic. We are the only manufacturer of bicycles in the SCAQMD, and as such experienced considerable difficulty finding water-borne substitutes for the Dupont paints we used to paint our products. We were able to get by for many years by using small quantities of paint (well below the minimum amount necessary to trigger enforcement), but the zero tolerance policies adopted and implemented by your organization threatened to put us out of business.

At the time the SCAQMD began to pursue legal action against us for non-compliance, no company was manufacturing water-borne paints adequate to meet the 1107 standards. Midway through the proceedings, we were approached by BASF who had only just developed a line of water-borne paints that could be adapted for use on our high-performance tandem bicycles. If they had not done so, Santana would be shuttered.

Health and Safety code 40440.8 and 40728.5 require your office to conduct a socioeconomic impact assessment in the event of a proposed rule change. In your presentation of August 27, you claim (without evidence) "ethyl acetate could act as a replacement solvent" at a much lower cost than current formulations using pCBtF. Nowhere is an explanation offered as to how it could be possible that a lower cost formulation had not already been adopted within the SCAQMD.

I hold a Doctorate in Economics from Claremont Graduate University and spent many years teaching undergraduate statistics and econometrics. I have published papers. If any of my students had come to me with the sort of handwaving claims on reformulation costs without considerably more statistical analysis, I'd have failed them.

I respectfully request a more thorough analysis of the socioeconomic impact be done before further consideration of the proposed Rule 1107 changes proceeds.

Best Regards,
Alex Huemer
General Manager
Santana Cycles, Inc.
P.O. Box 206
La Verne, CA 91750

(909) 596-7570 x110 (office)
(909) 276-1591 (cell)

