



September 10, 2025

Mr. Michael Morris
Panning and Rules Manager
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765
mmorris@aqmd.gov

Re: Public comments on Proposed Amended Rule 1107 (Coating of Metal Parts and Products)

Dear Mike:

RadTech International is pleased to comment on the proposed amendments to Rule 1107. UV/EB/LED technology plays a role in the metal parts and products coatings market. RadTech supports the district's efforts to improve air quality in the Basin without sacrificing a healthy business climate and believes that the implementation of UV/EB technology can accomplish both goals. The comments below reiterate those made during recent public meetings.

Request for Exemption

Our Association believes that the district can achieve voluntary emission reductions from companies who convert their processes to UV/EB/LED technology. According to staff, Proposed Amended Rule 1107 will seek to phase out two toxic compounds, para-ChloroBenzotriFluoride (pCBtF) and tertiary-Butyl Acetate (tBAC). UV/EB/LED materials are not formulated with pCBtF or tBAC therefore, RadTech urges the district to provide regulatory flexibility to UV/EB/LED processes. Our materials are typically well below 50 grams/liter in VOC content which is minimal compared to the proposed limits.

In keeping with past district policies and direction from the Governing Board, we respectfully request that UV/EB/LED materials be exempted from the rule requirements. An exemption would be an incentive for businesses to voluntarily choose UV/EB/LED technology resulting in additional emission reductions for the District.

Test Method

In order to avoid confusion, we urge the district to include ASTM D7767-11 in the rule. Currently Section (f)(5) "Multiple Test Methods" does not specify a method for energy curable materials. The Environmental Protection Agency has recognized that due to the very low VOC content

of our materials, the traditional EPA Method 24 is not suitable. Neither the EPA or the district have been able to develop a method that would accurately measure the very low levels of volatiles in our products. This leaves our companies in test method limbo. The problem is exacerbated by the labeling provisions in section (m) of the rule which require manufacturers to list a VOC content but yet, there is no specified method. The current language that allows “multiple” test methods is vague and could result in enforcement problems for our members and their customers. Since the impetus of the labeling requirements is to ensure that coatings are free of pCBtF or tBAC, we urge the district to spare UV/EB/LED materials of these requirements.

We appreciate your attention to this matter and look forward to a productive rulemaking process.

Sincerely,

A handwritten signature in black ink, appearing to read "Rita Loof". The signature is fluid and cursive, with the first name "Rita" and last name "Loof" clearly distinguishable.

Rita M. Loof

Director, Environmental Affairs