Wednesday, April 29 , 2026

Honorable Board Members
South Coast Air Quality Management District

Re: OPPOSE staff proposal-- Proposed Amended Rule 1136 – Wood Coatings

Dear SCAQMD Board Members:

Allied PhotoChemical, Inc. is pleased to comment on Rule 1136—Wood Coatings. Allied UV is the world-leading UV technology company, with over 200 UV installations in the United States. We do not provide our UV process technology to Chinese owned companies or any exports to China.

Our company stands opposed to the current staff proposal as it will have a negative impact on business and the environment. I was just visiting California last week, assisting in the installation of (2) new UV LED coating systems, with NO VOC's emissions.

We believe that the exemption language in Section (k) of Rule 1136 is a hurdle to the implementation of new technology into the Basin. Under the current regulatory framework, facilities are better off retaining outdated equipment instead of modernizing. The current rule treats all coating processes alike regardless of their environmental benefit. The staff proposal focuses on restricting production rather than emissions. The exemption is based on a one gallon per day ration for each facility. By converting to UV/EB/LED technology, facilities can grow their business production with a fraction of the emissions but the language proposed by staff does not allow flexibility for growth or voluntary emission reductions.

We support RadTech's request for an exemption based on emissions, not gallons used in any given day. We respectfully request that PAR Section (k)(1) Exemptions be modified as follows:

*"The provisions of this rule shall not apply to facilities that emit less than one pound per day of VOCs, as applied."*

Businesses who are willing to invest in clean technologies should be encouraged to do so and saddling companies with added regulations will be counterproductive to the District's mission.

Sincerely,

Michael Kelly

Chief Customer Officer

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