



UV Measurement and Process Control Instruments

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To: Honorable Board Members, South Coast Air Quality Management District

From: Jim Raymont, Director Sales, EIT 2.0 LLC Email: jraymont@eit20.com

Date: April 25, 2026

Subject: OPPOSE Staff Proposal-- Proposed Amended Rule 1136 – Wood Coatings

Dear SCAQMD Board Members:

EIT 2.0 LLC is pleased to comment on Rule 1136—Wood Coatings. EIT 2.0 LLC has been involved in the ultraviolet (UV) industry for over 42 years, producing measurement solutions to help end users control their UV process. Our products are sold in over 72 countries. We have a significant presence in Southern California through multiple distributors and end users. The use of UV allows our customers to maintain a manufacturing presence in the SCAQMD.

Our company stands firmly opposed to the current staff proposal as it will have a negative impact on business and the environment. 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 Under the current regulatory framework, facilities are better off retaining outdated equipment instead of modernizing.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. If Proposed Amended Rule 1136 for wood coatings is allowed to stand, what industry using environmentally friendly UV/EB/LED processes will the SCAQMD go after next?

Sincerely,

A handwritten signature in black ink, appearing to read 'Jim Raymont', with a stylized flourish at the end.

Jim Raymont
Director Sales, EIT 2.0 LLC
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