

April 28, 2026

Honorable Board Members
South Coast Air Quality Management District

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

Dear SCAQMD Board Members:

R&D Medical Products, Inc. is pleased to comment on Rule 1136—Wood Coatings. We have made UV cure products for over 25 years in Orange County. Our company stands 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 Under the current regulatory framework, facilities are better off retaining outdated equipment instead of modernizing.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.

Sincerely,

A handwritten signature in blue ink, reading "James Perrault", is written over a horizontal line.

James Perrault
R&D Director