



March 3, 2026

Mojtaba Moghani
Air Quality Specialist
South Coast Air Quality Management District
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Re: Public comments on Proposed Amended Rule 1136 (Wood Product Coatings)

Dear Mr. Moghani:

RadTech International is pleased to comment on the proposed amendments to Rule 1136. UV/EB/LED technology plays a role in the wood coatings market and can help the district's efforts to improve air quality in the Basin without sacrificing a healthy business climate. We previously submitted written comments as well as made comments during the public workshop and the Stationary Source Committee meeting. Since that time, we received additional feedback from our members regarding the definition for reactive diluents. This letter re-states our prior comments and includes changes to our proposed definition.

The stated goal of the rule amendments is to transition away from Products Containing pCBtF or t-BAC—UV/EB/LED formulations do not contain these materials and thus compliment the goal. One of the potential compliance options presented by staff is reformulation to products that are toxic free without requiring an air pollution control system. According to staff, thermal oxidizers generate corrosive byproducts such as hydrochloric acid for chlorinated solvents and hydrofluoric acid for fluorinated solvents. Because of their low levels of volatile organic compounds (VOC), thermal oxidizers are not required for UV/EB/ LED processes. The District has long recognized the benefits of our technology. The District's *Technology Assessment for Rule 1136—Wood Products Coatings* states:

“ UV coating on wood substrates is a viable option to regulatory compliance and coating performance for a wide variety of products. Normally, the advantages associated with the application of UV materials are: higher chemical resistance, increased impact and abrasion resistance, lower energy consumption and small equipment footprint compared to standard based cycle ovens, increased production rates through rapid curing, elimination of flammability concerns, and the potential for zero-VOC emissions.”

Recognition of EB & LED technologies

RadTech appreciates the inclusion of UV technology in the PAR 1136 staff report and the staff's acknowledgement that coating manufacturers have reformulated products to maintain performance while reducing regulated VOC content. According to staff, ultraviolet (UV)-curable, and high-solids coatings were early compliance strategies to transition from traditional high-solvent formulations. As mentioned during the public workshop, there are also Electron Beam (EB) and Light Emitting Diode (LED) processes so we would ask that the technology analysis reflect the existence of those technologies.

Section (c) 40-- Definitions

The current definition for reactive diluents lacks clarity. UV/EB/LED materials are reactive diluents and the district should clarify the definition as follows:

REACTIVE DILUENT is a liquid that acts as a viscosity reducing agent that reacts and binds into the finished coating producing virtually no VOC's, with energy-curable materials being one type of reactive diluent.

In the alternative, we would ask that the staff report make it clear that energy curable materials are covered under the definition of reactive diluents. Generally, UV/EB/LED materials are not formulated with any VOCs. Thus, it is not accurate to state that all reactive diluents are VOCs during application.

Section (f)- Prohibition of Possession

We have expressed concern that the rule could be interpreted to apply to manufacturers selling products outside of Southern California. During the manufacturing process, a manufacturer may be in possession of a product without knowing whether it will ultimately be sold in the South Coast basin. The prohibition on possession should therefore clarify that it applies only once the manufacturer has made a final determination to sell or distribute the product in Southern California. We believe this is consistent with the rule's intent as stated by staff during the workshop.

Section (k)—Exemptions

PAR 1136 exempts facilities that use less than one gallon per day of coating. We would urge the district to mirror this exemption for low VOC materials. The VOC limits for some categories in the rule can be as high as 750 grams/liter or 6.3 lbs/gallon. The VOC emissions of one gallon of that material would be 6.3 pounds per day. In contrast, the emissions from one gallon of 50 gram/liter material would be only .42 lbs per day. The rule should include an exemption for materials containing less than 50 grams/liter in VOC. We urge the district to include a "low VOC" exemption comparable to the exemption provided for low-use products.

Section (h) -- Test Methods

In order to avoid confusion, we urge the district to include ASTM D7767-11 in the rule. Currently Section (h)(8) “Multiple Test Methods” does not specify a method for energy curable materials applied as thin films. Some wood coating operations require that coatings be applied as thin films because thicker film samples (tested above the accepted wet film thickness), can result in poor through-cure leading to the coating peeling off the substrate.

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 nor 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 current language that allows “multiple” test methods is vague and could result in enforcement problems for our members and their customers. Section (h)(9)- Equivalent Test Methods—is vague leaving our businesses to negotiate with the district each and every time an operation uses ASTM D7767-11 which, is the industry’s accepted method for energy curable thin films. We urge district staff to provide clarification regarding the procedures for reporting VOC content for energy curable thin films, specifically by including guidance similar to what was established in the rulemaking process for Rule 1107.

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

Sincerely,



Rita M. Loof

Director, Environmental Affairs

Cc: Heather Farr, Michael Krause, Sarady Ka, Wayne Nastri