April 11, 2025

Mr. Michael Morris
South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765
Email: mmorris@aqmd.gov

Re: Public Comments-- Proposed Amended Rule 1171 – Solvent Cleaning Operations-- OPPOSE

Dear Mike:

RadTech International is pleased to comment on the proposed amendments to Rule 1171—Solvent Cleaning Operations. RadTech is the premier trade association in North America for Ultraviolet/Electron Beam/Light Emitting Diode (UV/EB/LED) technology. We speak on behalf of our over 800 members who are involved in a myriad of industry sectors ranging from printing and packaging to nail polish. UV/EB/LED processes are all electric, eliminating the need for add-on control devices thereby preventing emissions of criteria pollutants (Nitrogen Oxides) and Greenhouse Gases. Our products are not formulated with conventional solvents and therefore the emissions of Volatile Organic Contaminants (VOCs) are negligible. Energy curable materials are free of toxic materials and are considered "super-compliant" as they go above and beyond current rule requirements and provide the district with excess emission reductions. Transitioning to these cleaner materials help the district achieve its clean air goals. PAR 1171 will impact every single one of our market sectors.

Unfortunately, we cannot support the current rule proposal as it needlessly saddles our industry with burdensome requirements that do not result in any benefit to air quality. On the contrary, these overly prescriptive requirements act as a barrier to the implementation of clean technology. We urge the district to provide incentives in the form of regulatory flexibility, to companies who invest in UV/EB/LED technology. Our suggested changes are as follows:

Request for Exemption

As mentioned during the public workshop, RadTech urges the district to provide regulatory flexibility to UV/EB/LED processes. We cannot support the limit of 100 grams per liter for UV/EB/LED operations. Our members and customers have tried to use low VOC cleaners at their facilities for years only to find that acetone based cleaners leave residue on UV lamps and reflectors, thereby compromising the optical efficiency of the system. Additionally, acetone-based cleaners are highly flammable and since UV/EB/LED equipment is electrical, any spark can lead to devastating fires not only for the facility but for the community at large. Waterborne materials also have safety issues associated with their use around electrical equipment. This presents a risk to workers

We request an allowance to use alcohol-type cleaners which, generally have a Volatile Organic Compound (VOC) content of 800 grams per liter. Our materials are typically well below 50 grams/liter in VOC content and are already providing the district with emission reductions above and beyond those called for in district coating rules. Therefore, we humbly ask that you take those reductions into consideration as a mitigating factor in any potential increase in emissions that may result from using alcohol-based cleaners.

We propose that Section (j)(2)(H) be modified as follows:

Cleaning operations in Printing pre-press or Graphic Arts pre-press and energy curing areas, including the cleaning of film processors, color scanners, plate processors, film cleaning, plate cleaning and UV/EB/LED curing equipment.

Recordkeeping

We strongly oppose the new additional requirements for reporting, recordkeeping and labeling in the latest R1171 proposal under Section (g)(2). The current Rule 109 requirements cover UV/EB/LED materials and sufficiently provide the district with compliance verification. PAR 1171 creates a whole host of mandates on businesses, which will not result in any emission reductions such as:

(A) Product name of each Solvent Cleaner used;
(B) Name and address of the supplier for each Solvent Cleaner used;
(C) Dates and quantities in which each Solvent Cleaner was used during the time period specified by the Executive Officer; and
(D) VOC content of each Solvent Cleaner as used.

In fact, these additional requirements will deter businesses from investing in clean technologies like UV/EB/LED. Businesses who are willing to invest in clean technologies should be encouraged to do so and saddling with added regulatory costs will be counterproductive to the District's mission.

Definition

We appreciate the inclusion of a definition for energy curable materials in PAR 1171 and would urge the inclusion of ASTM 7767-11 as a suitable test method. The Environmental Protection Agency and the SCAQMD have long recognized that EPA Method 24 is not suitable for thin film UV/EB/LED Materials. The Multiple Test Method Section of the rule, (h)(5), is problematic in that it acts as a "gotcha" to businesses who may be subject to fines by the district due to lack of clarity on which method to employ. Thus, RadTech urges the inclusion of ASTM D7767-11 as suitable test method for UV/EB/LED materials. We propose the following language:

The VOC content of thin film Energy Curable Adhesives and Sealants may be determined by manufacturers using ASTM Test Method 7767-- Standard Test Method to Measure Volatiles from Radiation Curable Acrylate Monomers, Oligomers, and Blends and Thin Coatings Made from Them.

Thank you for your consideration of these issues and we hope we can work towards a resolution.

Sincerely,

Rita M. Loof
Director, Environmental Affairs

Cc: SCAQMD Board