



April 9, 2020

Dr. William A. Burke, Chair
South Coast Air Quality Management District Governing Board
21865 Copley Drive
Diamond Bar, CA 91765

Dear Chair Burke -

The Metal Finishing Association of Southern California [MFASC] appreciates the consideration the South Coast Air Quality Management District is giving to the impact the COVID-19 pandemic is having not only on public health but also the economic viability of businesses including metal finishers and our workers.

Following the discussion during the April 3 Meeting of the Governing Board, MFASC as a stakeholder has had a candid and timely conversation about the COVID-19 pandemic this week with district staff including Susan Nakamura and others on the district's policy and rulemaking team.

In our conversation, MFASC explained that all metal finishing companies are suffering significant losses in sales, temporary closures, and employees unwilling to work. It is quite unfortunate to state that we do not expect some shops to survive this recession.

The backbone of our industry is aerospace, and the COVID-19 pandemic is hitting this sector very hard. For instance, Boeing recently closed two major aircraft assembly facilities indefinitely – Seattle and South Carolina - where the 747, 767, 777, and 787 models are manufactured. In addition, those facilities that do not serve aerospace are experiencing serious disruption. Many have lost the majority of their customers.

The timing of this unprecedented pandemic is particularly tough. Many companies are still spending time and money complying with the comprehensive and costly mandates of Rule 1469. The equipment is more expensive than anticipated, and is taking longer to be installed and permitted.

Financial assistance remains problematic. Significant shops are thus far unable to apply for loans under the Payroll Protection Act because either their banks are not offering such loans or their banks have established criteria that the companies do not meet – for example, a limitation on the number of employees.

The stress in both time and energy the pandemic places on the key personnel makes them less available to participate in the regulatory process. Significant resources are necessarily dedicated to human resource issues including increased housekeeping and cleaning, social distancing in the workplace, separation of departments, and accommodations for workers with health issues.

The upside to these developments is that facilities will be operating less frequently and therefore there will be a decrease in emissions. It is anticipated that this situation will persevere several more months, perhaps a year or more.

For these reasons, MFASC is requesting forbearance during this time as the district considers the timeframe for new rulemakings such as Rules 1469.1 and 1426 that will significantly impact our shops. In our conversation with district this week, we agreed to stay in touch and provide timely updates.

Thank you for your consideration of our request. We would be pleased to discuss at your convenience.

Sincerely,

Bryan Leiker

Bryan Leiker, Executive Director
MFASC

C: Members, SCAQMD Governing Board
Wayne Nastri, SCAQMD Executive Officer