

March 10, 2017

Ms. Faye Graul
Executive Director
Halogenated Solvents Industry Alliance (HSIA)
Washington DC
fgraul@hsia.org

Dear Ms. Graul:

Hello, my name is Rob Cowan and I serve as the Director of Environmental, Health & Safety for Ducommun Incorporated (“Ducommun”). Ducommun delivers innovative manufacturing solutions to customers in the aerospace, defense and industrial markets. Founded in 1849, Ducommun specializes in two key areas – electronic systems and structural systems – to produce complex products and components for commercial and aircraft platforms, mission-critical military and space programs, and sophisticated industrial applications. Ducommun Aerostructures, Inc. (“Ducommun Aerostructures”) is a wholly owned subsidiary of Ducommun with manufacturing operations in California and Kansas. One of its sites is located in the city of Orange, California. This facility is one of the largest independent chemical milling companies in the United States and has been using chemical milling maskants containing perchloroethylene safely and effectively since Ducommun Aerostructures was founded in 1967. Chemical milling maskants are critical in the production of precision aerospace parts, and we have found through research and testing that perchloroethylene provides the best maskant performance, and importantly it is non-flammable.

In 1993, our Orange facility installed a new maskant system which includes a 27,000 gallon dip tank that is isolated in an enclosed building, with no worker exposure to solvent vapors. Numerous masking systems were evaluated at the time, including water-based maskants and flammable solvent-containing maskants. Perchloroethylene-based maskants provided far superior performance, and with an enclosed system provide optimum worker safety and no fire hazard.

The system utilizes Best Available Control Technology (BACT) using carbon adsorption. This system has been in continuous operation for over 20 years with a 99.5% recovery efficiency rate. It is extremely safe and effective from both an environmental as well as health and safety perspective. The recovered perchloroethylene solvent from the carbon adsorber is returned to the maskant supplier for reuse.

The banning of perchloroethylene would put Ducommun AeroStructures at a competitive disadvantage that in the worst case would result in lost jobs, and in the best case would result in having to install a maskant system that is less safe and effective (i.e., flammable solvent system, increased rework due to maskant defects, etc.). Ducommun AeroStructures respectfully urges that perchloroethylene continue to be permitted to be used as a safe and effective solvent system for chemical milling maskants.

Please feel free to call me with any questions or comments.

Sincerely,



Robert Cowan
EHS Director

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