Public Comments from Jason Constantine, President/COO, North End Composites and Back Cove Yachts

North End Composites is a boatbuilder in Rockland, Maine that employs 200 and constructs approximately 70 recreational fiberglass motoryachts and 25 additional fiberglass hull and deck sets annually.

As we discuss ozone transport and the adhesives used by fiberglass yacht manufacturers to construct these boats we need to understand the overall picture which extends well beyond the adhesives themselves. So that all are aware, these adhesives are used to temporarily bond layers of fiberglass together during their installation into the boat molds. Once the fiberglass is laid up in the mold, polyester, vinylester, and/or epoxy resins are used to permanently bond the layers of fiberglass.

These temporary adhesives are necessary during the construction process for infused fiberglass parts. This construction technology has become more commonplace throughout the industry over the last ten years as infused fiberglass parts have and the processes used to build them are far superior to the traditional open mold fiberglass lamination processes utilized, where individual layers of fiberglass were saturated with the polyester, vinylester, or epoxy resins out in the open as the fiberglass part was constructed. With infusion, all of the structural fiberglass is loaded into the mold without resin and then those resins are infused under a vacuum, in an enclosed environment, which reduces the quantity of VOC's emitted into the atmosphere.

The transition from open molding fiberglass parts to infusion lamination has reduced our shop's VOC emissions by nearly 50%. The requirement for spray adhesives for infusion lamination allows us to realize such significant improvements to air quality.

Unfortunately we must utilize small volume disposable spray cans to comply with the current regulations, which amounts to an increased burden on our landfills. Last year we purchased approximately 6000 16oz spray cans. Larger volume cylinders which are reusable, but currently restricted from use under current regulations, would replace these small cans and would allow our company to further reduce its environmental footprint.

Thank you very much for the opportunity to speak before you this afternoon.