



GRADY-WHITE BOATS

Exceptional attention to detail.

April 7, 2020

The Honorable John Barrasso
Chairman
Committee on Environment & Public Works
U.S. Senate

The Honorable Thomas Carper
Ranking Member
Committee on Environment & Public Works
U.S. Senate

S. 2754, American Innovation and Manufacturing Act of 2019.

Dear Chairman Barrasso and Ranking Member Carper:

Grady-White Boats manufactures boats in Greenville, NC. Grady-White has been in business since 1959 and currently we employ over 320 people. Our boats are sold by independently owned dealerships in the US and worldwide.

We use custom designed foam stringer and bulkhead systems supplied by Prisma Composite Preforms/Compsys, Inc. in some of our vessels. Compsys is located in Melbourne, FL. The Compsys stringer systems use polyurethane foam that has 134a as the blowing agent. These stringer systems are a critical structural component of these boats. We are dependent upon these structural systems and do not have any drop-in replacements ready to use if the supply of these stringer systems were to be interrupted. We also use Prisma preforms to produce our boats. Again, we have no readily available replacement for these preform beams.

The engineering resources required to design and implement major structural changes needed to replace these components would place a severe strain on a small business such as Grady-White Boats.

Compsys has determined there are no acceptable substitutes for the 134a blowing agent to produce these critical structural components of our boats. We urge Congress to provide an exemption for structural foam applications where acceptable substitute blowing agents are not yet developed. Such an exemption should allow sufficient time for development and testing of replacement products.

The need for essential use exemptions need to be addressed in the legislation in the Senate. Likewise, we believe the cost issues that have been raised should be addressed. We would also like to see the legislation address avoidance of a patchwork of differing state-level regulations by inclusion of a preemptive clause to align current and future state actions on regulations on GHG emissions.

Thank you for the Committee's consideration of S.2754, The AIM Act.

Sincerely,

Jim Hardin

Compliance and Facilities Manager
Grady-White Boats, Inc.
Greenville NC
Email: jhardin@gradywhite.com
Phone: 252-752-2111