



Proposed Amended Rule 1171 Solvent Cleaning Operations

Working Group Meeting 1
January 16, 2024

JOIN ZOOM MEETING
[HTTPS://SCAQMD.ZOOM.US/J/96856429612](https://scaqmd.zoom.us/j/96856429612)
MEETING ID: 968 5642 9612
TELECONFERENCE DIAL-IN: 1-669-900-6833

Agenda



Rule 1171 Background

Rule Objectives

Rule Development Process

Next Steps

Rule 1171 Background

- Rule 1171 was adopted in 1991 and limits VOC emissions from solvent cleaning operations
 - VOC limits established in grams of VOC per liter of solution and vary by application
 - Applies to users and suppliers of solvents used as part of a cleaning operation
 - Last amended May 2009 to extend compliance date for certain operations and exempt certain small usage, low emissions applications
- Applicable to cleaning operations where solvents used to remove oil, grease and other contaminants in a variety of industries such as textiles, electronics, chemical, lumber, printing, metal, and other miscellaneous manufacturing
- Examples of solvent cleaning:



Remote reservoir cleaning



Spray gun cleaning



Hand-wipe cleaning



Printer cleaning

Rule Objectives

Rule development initiated in response to South Coast AQMD Stationary Source Committee (SSC) directive, South Los Angeles Community Emission Reduction Plan (CERP) and stakeholder concerns

SSC

- In 2017, SSC directed staff to remove exemptions for tertbutyl acetate (TBAC) and parachlorobenzotrifluoride (PCBTF) if determined potential carcinogens
- In 2018, the Office of Environmental Health Hazard Assessment (OEHHA) finalized the Health Risk Assessment (HRA) concluding TBAC poses potential cancer risk
- In 2020, OEHHA finalized the HRA concluding PCBTF has greater cancer risk than TBAC
- Staff recommended to prohibit the use and sale of PCBTF and TBAC
 - In 2022, Rule 1168 – Adhesive and Sealant Applications was first South Coast AQMD rule to prohibit use and sale of PCBTF and TBAC
- PAR 1171 will assess feasibility of prohibiting PCBTF and TBAC in solvent cleaning

Compound	Cancer Potency Factor (Slope Factor)
perchloroethylene (perc)	0.021
DMC	0.0035
t-BAc	0.0047
pCBtF	0.03

Table 2-6 of the Final Staff Report for Proposed Amended Rule 1168- Adhesive and Sealant Applications (Amended November 4, 2022)

Rule Objectives *(continued)*

Rule development initiated in response to South Coast AQMD Stationary Source Committee (SSC) direction, South Los Angeles Community Emission Reduction Plan (CERP) and stakeholder concerns

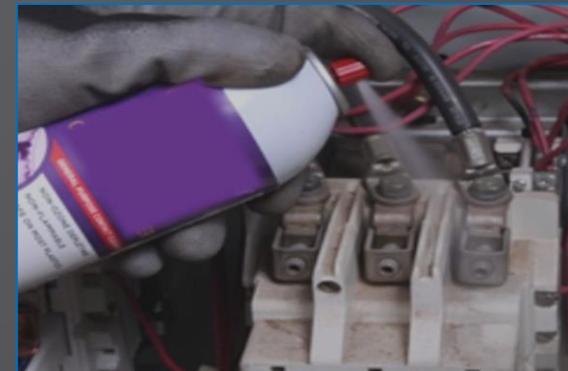
CERP

- Action established to initiate rulemaking to reduce emissions from auto body shops
 - Requiring best management practices for auto body shops identified as strategy to reduce emissions
- PAR 1171 will find potential to reduce emissions from auto body shops including prohibiting use of PCBTF



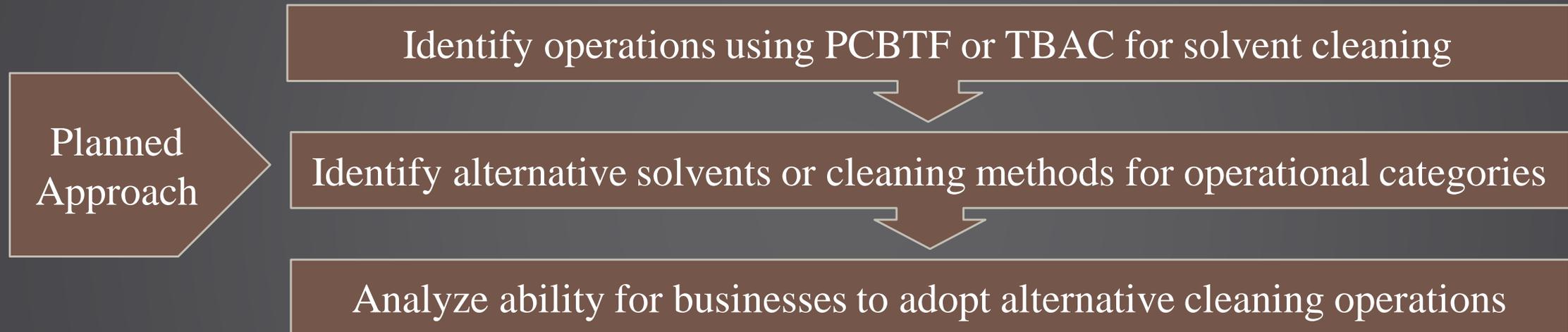
Stakeholder Concerns

- Stakeholders expressed concerns about ability to continue operations and comply with rule for certain water and electricity distribution operations
- PAR 1171 will address stakeholder issues and concerns



Prohibiting Use of PCBTF and TBAC

- Staff will assess the feasibility of prohibiting the use of PCBTF and TBAC in solvent cleaning operations



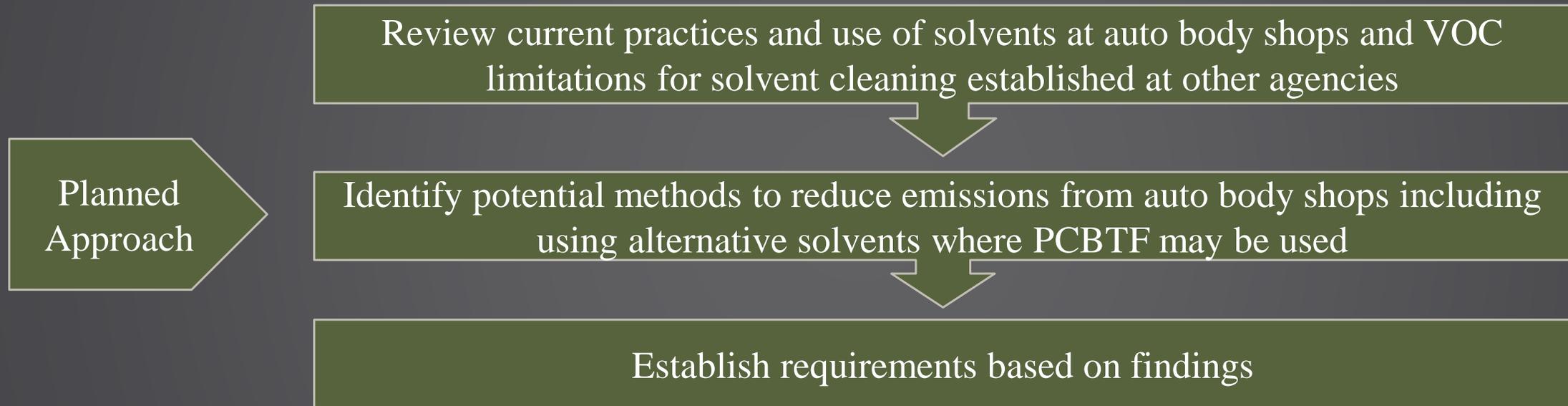
- Potential strategies to prohibit use of PCBTF and TBAC:
 - Use alternative solvents that comply with current VOC limits
 - Use alternative solvents that may require increased VOC limits where needed to phase out PCBTF and TBAC (similar to Rule 1168 November 2022 amendment)
 - Open to stakeholder suggestions

PCBTF and TBAC in Solvent Cleaning

- Staff gathering information about use of PCBTF and TBAC in solvent cleaning operations
 - Recent discussions with suppliers indicated the use of PCBTF is limited
 - Staff is aware of industries using PCBTF, including:
 - Aerospace
 - Medical
 - Printing
 - Automotive
 - Energy
- Staff is unaware of use of TBAC containing solvents for cleaning
 - TBAC is a high VOC chemical and is not considered an Exempt Compound in Rule 1171
 - Facilities likely using lower VOC solvents
- Staff seeking information from industry, suppliers and stakeholders on use of PCBTF and TBAC in solvent cleaning operations

Reducing Emissions from Auto Body Shops

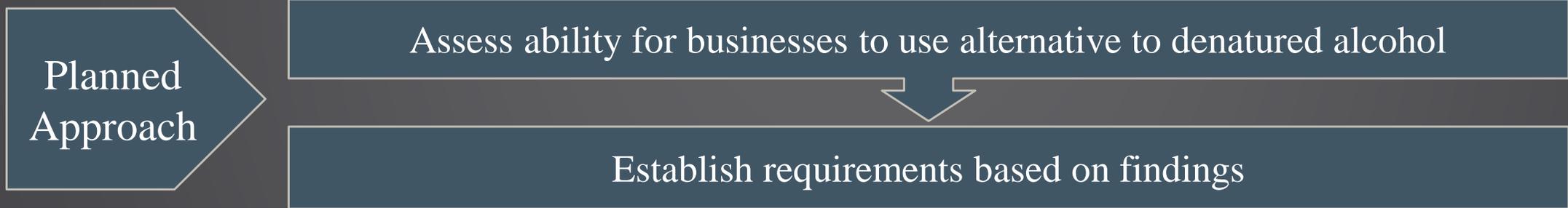
- Staff will assess potential to reduce emissions from auto body shops and other affected facilities



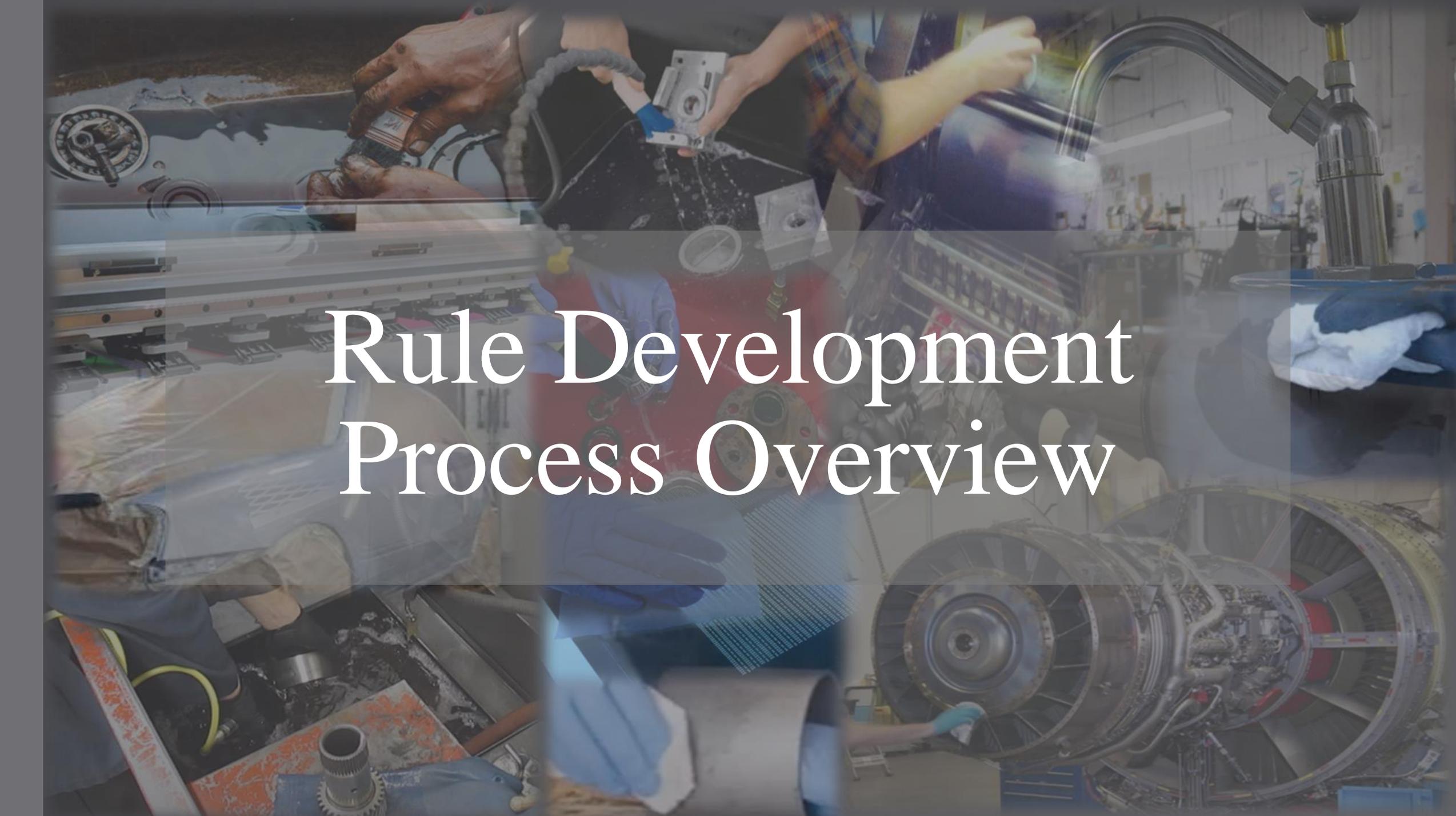
- Potential strategies to reduce emissions from auto body shops:
 - Prohibit use of TBAC and PCBTF where feasible
 - Consider establishing best management practices
 - Open to stakeholder suggestions

Stakeholder Concerns

- Certain stakeholders rely on exemption (paragraph (g)(4)) that allows use of denatured alcohol in an aerosol spray for cleaning specific equipment used in water and electricity distribution
 - Manufacturer specified use of denatured alcohol
- Stakeholders request ability to use liquid denatured alcohol to clean specific components
 - Previously used aerosol product but supplier no longer operating and unsure of reliability of product availability
 - Identified benefits to switching to liquid denatured alcohol from aerosol denatured alcohol



- Potential strategies to address issue
 - Use alternative solvents
 - Allow use of liquid denatured alcohol for specific equipment with potential usage maximum
 - Open to stakeholder suggestions



Rule Development Process Overview

Overview of Process

Working group and stakeholder meetings continue throughout rule development process

Information
Gathering and
Analysis

Preliminary
Draft Rule
Language and
Staff Report

Public
Workshop

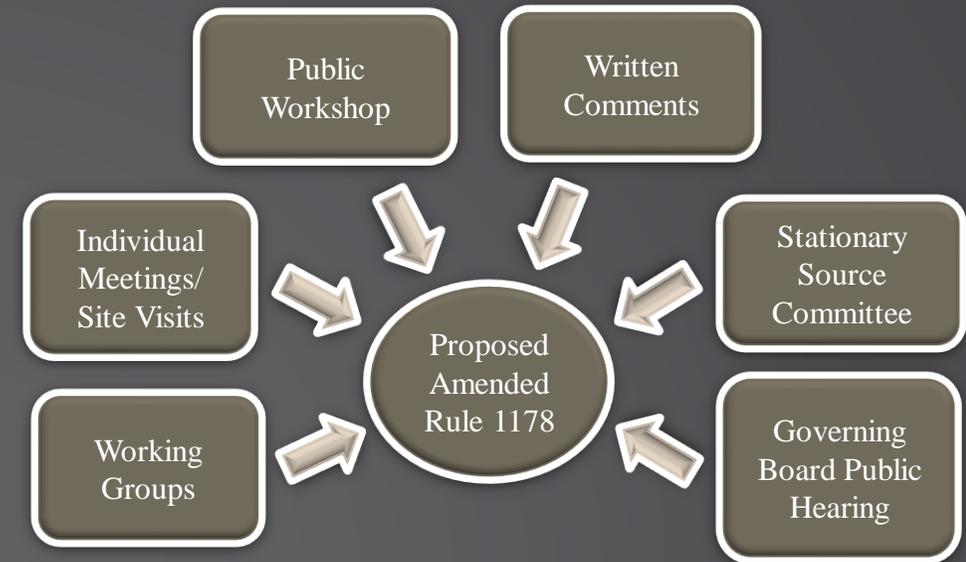
Draft Rule
Language and
Staff Report

Public
Hearing

- Staff is available throughout the rule development to meet with stakeholders via phone call, email, virtual meeting, face-to-face meeting

Stakeholder Participation

- Several opportunities to provide input during rule development
 - Written comments
 - Individual meetings and site visits
 - Public meetings including working group meetings



Working Group Meetings

- Multiple meetings held throughout rule development and open to public
- Participants may include industry representatives, equipment suppliers, community groups, environmental groups and other stakeholders
- Objectives:
 - Build consensus and work through issues
 - Opportunity for early input
 - Develop a rule that affected facilities can implement
 - Assist staff in understanding issues, industry practices and applicable technologies

Next Steps

Information Gathering and Analysis

- Seeking information now from businesses, suppliers, other stakeholders on:
 - Use of PCBTF and TBAC in cleaning operations
 - Alternatives to PCBTF and TBAC solvents/limitations of alternatives
- Explore potential for emission reductions at auto body shops
- Explore alternatives to using denatured alcohol for certain equipment

Next Working Group Meeting

- Present initial rule concepts based on information received/obtained
- Tentatively planned for late 1st quarter/early 2nd quarter
- Conduct additional Working Group Meetings as needed

Rule Timeline

- Preliminary Draft Rule Language late 2nd quarter/early 3rd quarter
- Public Hearing TBD

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