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## FEATURE ARTICLE

### OTC Model Rule and Critical Cleaning

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A new rule restricting solvent degreasing to approaches similar to those in the Los Angeles area, is coming to the Northeast U.S. Before you say, "I don't work in that region, so it won't affect me," or "Who cares? I don't use solvents; I use water-based cleaning," think again.

The EPA cannot mandate specific rules for individual states. However, it has deemed that more areas throughout the U.S. do not have acceptable air quality. This prompts a geographically-encompassing chain reaction that is likely to result in lower allowable emissions of VOCs in many areas.

#### *OTC*

The Ozone Transport Commission (OTC), an organization of states in the Northeast/Mid-Atlantic region created under the Federal Clean Air Act, is charged with achieving better air quality, in part by decreasing Volatile Organic Compounds (VOCs). OTC is putting together a Model Rule for Solvent Degreasing that can be adopted or adapted by individual states. In its current form, the rule contains language nearly identical to that found in the South Coast Air Quality Management District (SCAQMD) Rule 1122 in Southern California; the Rule also takes cues from the Santa Barbara Air Pollution Control District. The VOC limit in the Model Rule is 25 g/L. If a company wanted to use higher VOC limits, "airless" cleaning systems would be required.

In times of limited resources, just as OTC is considering regulatory approaches similar to Southern California, regulatory agencies outside the OTC might logically follow suit.

#### *Restricted manufacturing options*

Manufacturers must have critical cleaning options that are effective for current and upcoming performance requirements; and we are concerned that the Model Rule in its current format does not provide those options. For example, many of the cleaning agents you may depend on, even the aqueous ones, have VOC levels well above 25 g/L; and you may need those additives for effective cleaning. In addition, the wording for airless/airtight systems restricts candidate systems; those systems are not appropriate for all cleaning applications. Further, the proposed manufacturing exemptions largely reflect concerns of a few companies in Southern California, concerns that were expressed about 10 years ago. Based on our experience with current manufacturing throughout the U.S., different exemptions would be more relevant.

OTC Solvent Degreaser Model Rule: (You may need to copy and paste the link into your browser)

<http://bfksolutions.com/Newsletter/Articles/OTC%20Solvent%20Degreaser%20Model%20Rule%20for%202011%20STAKEHOLDER%20REVIEW%20DRAFT%20082710B%20GMP.pdf>

BFK comments to OTC:

<http://bfksolutions.com/Newsletter/Articles/BFK%20comments%20OTC%20degreasercomments.pdf>