



CLAIRE MANUFACTURING COMPANY

Mfg. of Aerosols for Sanitary Supply & Specialty Products

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December 14, 2011

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Illinois Pollution Control Board
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STATE OF ILLINOIS
Pollution Control Board

PC# 4

Subject: Post-hearing Comments on Case # R12-8

Dear Mr. Fox:

Claire-Sprayway, Inc. appreciates the opportunity to submit post-hearing comments on the proposed amendments to 35 Ill. Adm. Code Part 223, Subpart B. Specifically, we would like to provide a response to questions posed by Mr. Anand Rao regarding the General Purpose Degreaser product category.

Mr. Rao first asked whether companies formulate low-flammability General Purpose Degreaser products without using perchloroethylene, methylene chloride and trichloroethylene *i.e.*, chlorinated solvents). The answer to Mr. Rao's question is "yes." However, based upon approximately six years of experience in formulating General Purpose Degreaser products for sale in California, we have determined that the alternatives to the three specifically identified chlorinated solvents do *not* provide the same protection from flammability.

Specifically, the LVP-VOM solvents that are used as substitutes for the three chlorinated solvents typically have flash points in the combustible range. Moreover, the products formulated with the LVP-VOM substitutes dry very slowly and do not allow for immediate use of the part. This causes considerable delays in the maintenance process. As a practical matter, the truism that "time is money" is very relevant to the maintenance work (particularly in automotive maintenance). Consequently, mechanics are very resourceful and may resort to using unregulated solvents that perform like the chlorinated solvent products they used in the past to remove or dissolve grease, grime, oil and other oil-based contaminants from metallic parts and surfaces.

Mr. Rao posed a second question as to whether general purpose degreasers formulated with alternative LVP-VOM solvents are being sold in other states that impose a restriction on the use of the three chlorinated solvents. The answer is "yes." However, our customers generally dislike the reformulated products since the products are deemed to be ineffective in removing grease from mechanical parts and surfaces for the same reasons stated above and they give off obnoxious odors.

In conclusion, Claire-Sprayway requests that the Board consider: (1) workplace safety reasons for the continuing use of effective low-flammable General Purpose Degreaser products to effectively

reduce the potential for serious flash fires that have the potential to cause serious burns; and (2) the fact that minimal, if any, amount of VOM emissions will be achieved by the proposed restriction. Therefore, our company recommends that the Board *delete* the restrictions for the General Purpose Degreaser product category set forth in the newly-proposed 35 IAC § 223.211.

Respectfully,

A handwritten signature in black ink that reads "Ronald Cepa". The signature is written in a cursive, flowing style.

Ronald Cepa
Regulatory Compliance Specialist

cc: Joe Yost (CSPA)