



Representing Household & Institutional Products

Aerosol - Air Care - Cleaners - Polishes  
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December 13, 2011

via e-mail transmission  
and FedEx Overnight mail

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DEC 14 2011  
STATE OF ILLINOIS  
Pollution Control Board

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

PCH 1

Dear Mr. Fox:

The Consumer Specialty Products Association (CSPA) appreciates the opportunity to submit post-hearing comments on the proposed amendments to 35 Ill. Adm. Code Part 223, Subpart B. Specifically, CSPA would like to provide a response to questions posed by Mr. Anand Rao regarding the General Purpose Degreaser product category.<sup>1</sup>

Mr. Rao first asked whether companies formulate low-flammability General Purpose Degreaser products<sup>2</sup> without using perchloroethylene, methylene chloride and trichloroethylene (*i.e.*, chlorinated solvents). After consulting with member companies that manufacture and market this type of product, the answer to Mr. Rao's question is a qualified "yes." However, based upon approximately six years experience in formulating General Purpose Degreaser products for sale in California, CSPA member companies have determined that the alternatives to the three specifically identified chlorinated solvents do *not* provide the same protection from flammability.

Specifically, the LVP-VOM<sup>3</sup> 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.

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<sup>1</sup> See Transcript of the Illinois Pollution Control Board public hearing held on November 17, 2011, at p.15, lines 1-4 and 17-20.

<sup>2</sup> The definition for "General Purpose Degreaser" is set forth at 35 IAC § 223.203.

<sup>3</sup> The terms "VOM" and "VOC" have the same meaning. See 35 IAC § 211.7150(a).

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.<sup>4</sup> Based upon information provided by CSPA member

companies, the answer is “yes.” However, based on these companies’ experience, their 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.

In conclusion, CSPA respectfully reiterates our member companies’ request 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.<sup>5</sup> Therefore, CSPA recommends that the Board *delete* the restrictions for the General Purpose Degreaser product category set forth in the newly-proposed 35 IAC § 223.211.

CSPA appreciates the opportunity to participate as an active stakeholder in this rulemaking process. In addition, CSPA appreciates the opportunity to respond to the good questions posed by Mr. Rao during the public hearing.

Respectfully submitted,



Joseph T. Yost  
Senior Director, Strategic Issues Advocacy

cc: Charles E. Matoesian, Esq., Illinois Environmental Protection Agency  
Rory Davis, Illinois Environmental Protection Agency  
CSPA Air Quality Committee and Product Task Forces  
Automotive Specialty Products Alliance

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<sup>4</sup> The following states have promulgated final regulations restricting the use of the three chlorinated compounds in general purpose degreasers: California, Connecticut, Delaware, Indiana, Maine, Maryland, Massachusetts, Michigan, New Jersey, New York and Rhode Island.

<sup>5</sup> Perchloroethylene and methylene chloride are exempted from the definition of “VOM” for the purposes of compliance with VOM limitations or VOM content requirements since these compounds have very low photochemical reactivity. See 35 IAC § 211.7150(a) and 40 C.F. R. § 51.100(s).

DEC 14 2011

STATE OF ILLINOIS  
Pollution Control Board

District of Columbia

SS

PROOF OF SERVICE

I, the undersigned do hereby state and attest to the fact that I have served the attached copy of the post-hearing comments that the Consumer Specialty Products Association filed on the REGULATORY PROPOSAL FOR AMENDMENTS TO 35 ILL. ADM. CODE PART 223 STANDARDS AND LIMITATIONS FOR ORGANIC MATERIAL EMISSIONS FOR AREA SOURCES upon the person to whom it is directed, by placing a copy in an envelope addressed to:

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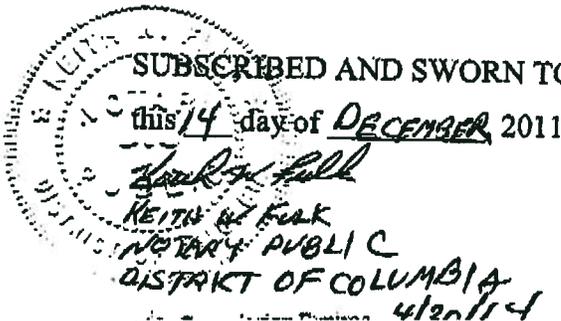
and mailing same by First Class Mail from Washington, DC, with sufficient postage affixed, as indicated above.

DATED: December 14, 2011

CONSUMER SPECIALTY PRODUCTS  
ASSOCIATION

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By:   
Joseph T. Yost  
Director, Strategic Issues Advocacy

SUBSCRIBED AND SWORN TO BEFORE ME  
this 14 day of DECEMBER 2011  
  
Keith W. Fink  
NOTARY PUBLIC  
DISTRICT OF COLUMBIA  
4/20/11-4