



CHICAGO AEROSOL™

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

Dear Mr. Fox:

Chicago Aerosol, an Illinois corporation and member of 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, we 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). As a member company of CSPA that manufactures and markets this type of product, the answer to Mr. Rao's question is a qualified "yes." However, as a chemist experienced in formulating General Purpose Degreaser products for sale in California and elsewhere in the US, 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<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 and

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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).

industrial maintenance). Consequently, mechanics may resort to using unregulated cleaning solvents such as gasoline or paint thinners 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.<sup>4</sup> Based upon our experiences, the answer is “yes.” However, also based on these experiences, 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.

In conclusion, we strongly support the position of CSPA and request that the Board consider: (1) workplace safety reasons for the continuing use of effective low-flammable General Purpose Degreaser products; 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.

Respectfully submitted,

Edward S. Piszynski  
Vice President  
Laboratory Services

cc: J. Yost, CSPA

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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).