



## **ILMA Continues Comments to California South Coast Air Quality Management District**

ALEXANDRIA, VA (March 9, 2009) — ILMA has sent a letter to the South Coast Air Quality Management District (SCAQMD) Governing Board, supporting the adoption of Proposed Rule 1144, which will establish volatile organic compound (VOC) limits for vanishing oils and rust inhibitors used at industrial facilities in the four counties that make up the Los Angeles area.

ILMA has been an active participant in the rulemaking process for Proposed Rule 1144 since August, 2008, including participation in workgroup and other meetings, and is pleased to support the adoption of the rule. ILMA submitted comments to SCAQMD in October and November 2008, addressing specific concerns with the proposed rule. In the new comment, ILMA announces its support for the rule it helped develop over the past seven months of cooperative work with SCAQMD.

Southern California is saddled with significant air quality challenges, and the SCAQMD is working to pursue multiple regulatory avenues to improve air quality for residents of the South Coast Air Basin. In its original proposed rule, SCAQMD intended to regulate the VOC content of direct-contact lubricants and metalworking fluids in addition to vanishing oils and rust inhibitors.

In December 2008, and again in January 2009, the rulemaking process was delayed in order to address the concerns raised by ILMA and others with the test method SCAQMD intended to use to determine compliance, after ILMA members ran the SCAQMD test method on multiple samples and found the results were not reproducible. ILMA successfully argued that inter-laboratory tests were needed, and SCAQMD formed a laboratory subcommittee including ILMA and ILMA member companies to work on an effective and valid test method.

As a result, SCAQMD bifurcated its rulemaking, moving forward with its regulation of the VOC content of vanishing oils and rust inhibitors. SCAQMD will continue to work with ILMA and other stakeholders on validating test methods for direct-contact lubricants and metalworking fluids and may impose VOC limits on these products at a later date.

Proposed Rule 1144 is “intended to reduce volatile organic compound (VOC) emissions from vanishing oils and rust inhibitors used at industrial facilities during manufacturing operations where the fluids come in direct contact with the parts and products. Such operations would include metal working or metal removal activities during the manufacturing and assembly of products and goods.” ILMA recommends adoption of the rule with one technical correction to remove confusion, but not alter the intent of the proposed rule.

ILMA also pledges its intent to continue to work with AQMD staff and other interested stakeholders, to determine valid methodologies and screening tools for testing, and to assist in development of VOC limits when appropriate.

“After our success with improving the testing methodologies for the SCAQMD, we were eager to see the collaboration come to fruition,” ILMA Executive Director Celeste Powers said. “ILMA’s involvement with the entire process helped make sure the final rule will work for everyone involved.”

Complete copies of all letters from this important collaboration are available on the ILMA website at [www.ilma.org](http://www.ilma.org).

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The Independent Lubricant Manufacturers Association (ILMA) was founded in 1948. ILMA's 300 members include independent lubricant companies that produce more than 25% of all lubricants and 80% or more of the metalworking fluids and other specialty industrial lubricants sold in the U.S., and key suppliers of raw materials and services to independent lubricant manufacturers.