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April 28, 2010

***By Electronic Mail***

Laki Tisopulos, PhD, P.E.  
Assistant Deputy Executive Officer  
South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, California 91765

***Re: Proposed Amended Rule 1144***

Dear Dr. Tisopulos:

The Independent Lubricant Manufacturers Association (ILMA) provides this update on the finalization of ASTM Method E1868 -10, Standard Test Method for Loss-On-Drying by Thermogravimetry, and its accompanying Inter-Laboratory Study (ILS) 500. The revised ASTM Method E1868-10 will be sent out for concurrent approval by members of ASTM's E37 Committee and E37.01 Subcommittee on April 29, 2010. Under ASTM procedures, this balloting will be completed by May 29, 2010.

ILMA remains confident that ASTM Method E1868-10 will be approved prior to the Governing Board's June 2, 2010 public hearing on Proposed Amended Rule 1144 (PAR 1144). ASTM Method E1868-10 was delayed in being sent out for the current ballot for two reasons. First, the one prior, negative ballot was resolved to the satisfaction of Committee member who objected. Second, considerable effort was made to include the numerous comments submitted by District staff. At this time, ILMA is not aware of any objections, including from AQMD, to ASTM Method E1868-10.

As you know, ILMA has been and remains concerned with the development of AQMD Method 319 as an alternative to ASTM Method E1868-10. If for some reason ASTM Method E1868-10 is not finalized by the June 2, 2010 public hearing, ILMA will object strenuously to the consideration of AQMD Method 319 as a substitute test method by the Governing Board at that hearing. At a minimum, AQMD Method 319 has not been subjected to validation testing as required by the Governing Board in its March 6, 2009 Resolution on Rule 1144. Given all of the time that ILMA and the District staff have devoted to modifying ASTM Method E1868-10 to allow it to be useful for the purposes of both the District and the regulated community, ILMA instead would prefer a second, brief continuance to allow the approval process for ASTM Method E1868-10 to be completed.

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April 28, 2010

ILMA looks forward to having the robust test method being balloted by ASTM and included in PAR 1144 finally resolved in the coming weeks. Please let us know if there are any concerns or questions with the ASTM approval process.

Sincerely,

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

Celeste M. Powers, CAE  
Executive Director

cc: Naveen Berry, AQMD  
Michael Morris, AQMD  
ILMA Board of Directors  
ILMA SHERA Committee  
Charles F. Timms, Esq.  
Jeffrey L. Leiter, Esq.