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December 16, 2009

Mr. Naveen Berry

Mr. Michael Morris

South Coast Air Quality Management District

21865 Copley Drive

Diamond Bar, California 91765

***Re: Proposed Rule 1144 – Lubricants, Metalworking Fluids and Rust Inhibitors***

Dear Messrs. Berry and Morris:

This letter supplements the Independent Lubricant Manufacturers Association's ("ILMA") October 22, 2009 correspondence to Dr. Laki Tisopulos and confirms the discussion at the December 1, 2009 Laboratory Sub-Committee meeting (the "December 1 meeting") concerning ILMA's round-robin testing using thermo gravimetric analysis ("TGA") to measure volatile organic compounds ("VOCs") in the categories of products potentially intended for regulation by Rule 1144.

As ILMA reiterated during the December 1 meeting, the Association originally proposed that the TGA round-robin testing for Rule 1144 would be conducted in triplicate for each of the five samples supplied by ILMA and distributed to the ten testing laboratories by the South Coast Air Quality Management District ("AQMD"). The five samples initially agreed to by ILMA and AQMD are: one solvent-based rust preventative; one water-diluted metalworking fluid; two petroleum-based metalworking fluids; and, one petroleum-based heavy-duty machine lubricant.

In a subsequent conversation with members of ASTM Committee E37.01, ILMA's John Howell and AQMD's Michael Morris were told that, given practical and real limitations on laboratory time, better statistical results would be generated by conducting TGA testing five times each on three samples, rather than the triplicate tests each on five samples. A decision was made, in which Mr. Morris participated, to delete the water-diluted metalworking fluid and the petroleum-based heavy-duty machine lubricant from the TGA round-robin testing.

ILMA continues to believe that the TGA method can be successfully used on high-water content metalworking fluids. From the discussion at the December 1 meeting, ILMA understands AQMD's concerns with omitting the water-diluted metalworking fluid sample from the TGA

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December 16, 2009

round-robin testing. Accordingly, ILMA contacted the ten laboratories conducting the TGA round-robin testing, and there is agreement to run TGA tests five times on each of the four samples, adding back the water-diluted metalworking fluid. As discussed in ILMA's October 22, 2009 correspondence, the raw data from these TGA tests will be sent to ASTM for analysis. The raw data also will be shared with AQMD.

ILMA reiterates its understanding that, if the TGA testing on these four samples passes the pass/fail criteria, and the TGA test procedure is validated by ASTM, then no additional steps need to be taken by the Association to justify incorporating the TGA test procedure into Rule 1144 as an acceptable method to determine VOCs in the product categories identified in the Rule.

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: Dr. Laki Tisopoulos  
ILMA AQMD Working Group  
Jeffrey L. Leiter, Esq.  
Charles F. Timms, Esq.