

ATTACHMENT D

KEY ISSUES AND RESPONSES

Rules 102 - Definition of Terms, 1106.1 - Pleasure Craft Coating Operations, 1151 - Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations

1. Occidental Chemical Corporation (OxyChem) supports the proposed amendments to Rule 102. OxyChem strongly supports the modification of the exempt compound definition which removes the distinction between Group I and Group II Compounds. The proposed amendment will allow the use of PCBTF for applications regulated under Rules 1106.1 and 1151. PCBTF is sold by OxyChem under the trade name OXSOL® 100. The proposed amendment to Rule 102 would allow coating formulations to employ OXSOL® 100 and thereby contribute to improved air quality.

The proposed amendments to Rule 102 have been modified. The AQMD re-evaluated its decision to remove the group categories and the warning that currently exists in the "Exempt Compound" definition. A decision to maintain the current structure of the definition has been made. This decision was made to ensure that the public is aware that Group II Compounds may be subject to future regulations. Furthermore, maintaining the existing structure of this definition is consistent with recommendations received by a member of the public and by the AQMD's Health Effects Officer. The proposed amendments, as revised, would allow the use of PCBTF and VMS for operations regulated under Rules 1106.1 and 1151.

2. The Institute for Research and Technical Assistance (IRTA) hereby requests that the AQMD delay the exemption of perchloroethylene until the Halogenated Solvents Degreasing NESHAP regulation is effective for existing facilities, which becomes effective December 1997. Further, IRTA requests the AQMD maintain the group categories and warning currently existing in the VOC definition.

The proposed amendments have been modified and perchloroethylene is proposed to be listed as a Group II Exempt Compound effective December 2, 1997.