

From our perspective, we have implemented permitting and enforcement activities, with respect to the NESHAP as soon as practical, given the limits of our resources, and our ability to integrate it into other key programs.

2-4 Of the four chemical milling maskant operations in the district, two have installed carbon adsorption equipment and two have reformulated with water-based products. The SCAQMD does not believe these industries will choose to remove their carbon adsorption systems or reformulate back to perchloroethylene due to safety, exposure and liability issues associated with its use. As noted by the commentator, the Aerospace NESHAP will regulate chemical milling operations as opposed to the chemical processing operation. SCAQMD Rule 1124 does place restrictions on chemical processing operations, subparagraph (C), however, less perchloroethylene. Therefore, there is a potential for smaller coating facilities to switch but feasibility and liability (such as odor in hand wiping operation) should preclude any substantial increase in usage of perchloroethylene.

2-5 By law, the SCAQMD has no authority to regulate consumer products. As noted in the comment, consumer products are regulated by CARB. Since CARB has already exempted perchloroethylene from VOC regulations in consumer products, increased usage of perchloroethylene in brake cleaner formulations would be a result of CARB's rulemaking activities, not the amendments to Rule 102. If CARB's needs assessment demonstrates that an ATCM is necessary for this source category, the commentator is correct in stating that the SCAQMD would implement it.

2-6 Thank you for the information and data. As stated previously, the implementation date of the de-listing of perchloroethylene will coincide with the implementation date of the federal NESHAP.

2-7 The SCAQMD appreciates your suggestion and has decided to retain the Groups I and II Exempt Compounds categories as recommended by the commentator.

2-8 The SCAQMD has decided to keep ODCs in the Group II Exempt compounds list. Otherwise, modifications have been made to PAR 102 that reflect most of the recommendations made by the commentator.

APPENDIX C

DRAFT RULES 102, 1106.1, 1151, 1171, AND 1302

In order to save space and avoid repetition, please refer to the latest version of the proposed rules located elsewhere in the Board Agenda package for proposed amended Rules 102, 1106 I, 1151, 1171 and 1302.

Separate hard copies of this Draft Environmental Assessment with no significant adverse impacts, which include the proposed rules, can be obtained through the AQMD Public Information Center at the Diamond Bar Headquarters or by calling (909) 396.3600.

APPENDIX D

INDUSTRIES CONTACTED

Rule 102 Environmental Assessment Worksheet (Perchloroethylene Usage)

Solvent Cleaning (R1171) Formulators:

Solvent cleaning is either hand wiping and remote reservoir. Due to odor and safety issues, facilities will not switch to perchloroethylene in the hand wiping operations. Operators could potentially increase perchloroethylene usage in remote reservoir activities but it is not an easy replacement as chemical properties differ from the TCA previously used. Do not foresee solvent cleaning as significant impact however could not rule out the possibility of anyone increasing perchloroethylene usage. Because of availability and feasibility of aqueous solutions, staff sees no reason why they would revert to a toxic solution. Perchloroethylene is non-flammable and inexpensive (30 cents per pound). Would be subject to the degreaser NESHAPs.

Automotive Coating (R1151) Formulators:

Company Name	Contact	Substrate (% of business)	Comment
du Pont	Karl Shultz 302.773.4394	Automotive Cigs (80%) Industrial Cigs (20%)	Do not use perchloroethylene in their formulations because it is a chemical which is difficult to balance the formula and create a feasible product. Concerned with health issue and OSHA regs which limit the lifting weight of goods.
PPG Industries	Ron Hiltovsky 216.671.0050	Automotive Cigs/Industrial (Metal, Plastics) (85%), Wood/Architectural Cigs (15%)	Do not use perchloroethylene in their formulations and do not anticipate use in the future. Company has a policy to reduce air toxics. Cross media impacts include handling procedures (human health), contaminating groundwater supply and hazardous waste disposal. Overall, potential increase in costs to use chlorinated solvents.
Sherwin Williams	Marc Krutner 216.566.2000	Automotive Cigs	Company policy is to not use chlorinated solvents (including perchloroethylene) in their formulations and have no plans use perchloroethylene in the future.
BASF Corp.	Bradley Richards 419.877.5308	Automotive Cigs	Do not use perchloroethylene in their automotive cig formulations or sell as a solvent cleaner. They avoid any chlorinated solvent reformulations and do not plan to use perchloroethylene in the future.
AKZO Nobel Coatings	Ray Stradski 770.662.8464 Paul Blair 770.798.8695	Automotive Cigs	Do not use perchloroethylene in their formulations and have no plans use perchloroethylene in the future.

Valspar Refinishes	Richard Rawlins 601.798.4731 La Bree Trucell 800.769.2857	Automotive Cigs	Do not use perchloroethylene in their formulations and have no plans use perchloroethylene in the future.
American Standox, Inc.	Dan Dutra 313.454.4556	Automotive Cigs	left message 2/13, 2/14, 2/18, 2/25

Coating (R1107, 1113, 1136, 1145) Formulators:

Company Name	Contact	Substrate (% of business)	Comment
Frazee	Fernando Pedrosa 619.276.9500	Architectural Cigs (80%), Wood/Metal Cigs (20%)	Don't use any chlorinated compounds (perchloroethylene, 1-1-1 TCA) as company policy. There is a wood furniture NESHAPs. Suggested looking into solvent and electronic component cleaning operations. Frazee not even progressing quickly with acetone for concerns with safety.
Coatings Resource	Ed Laird 714.379.8888	Plastic, Rubber, Glass Cigs (54%) Wood Cigs (32%) Metal Cigs (14%)	Perchloroethylene is not compatible as it is a heavy solvent and detail is lost. Would prefer acetone and oxy solvents. Too expensive to use. Perchloroethylene costs ~ \$8/gal which is the cost of the actual coating. Does not presently use perchloroethylene in coating formulations and does not plan to use in the future.
IVC	Curt Wild 317.636.4007	Plastic, Rubber, Glass Cigs	Not available for comment.
Sherwin Williams	Jorge Ramos/ Dennis Ruffel 310.404.9921	Metal Cigs, Architectural Cigs, Wood Cigs	Do not presently use perchloroethylene in coating formulations not plan to use in the future. They perform solvent cleaning but in very "controlled situations." Would sell it if asked by customer.
Shinclair Paints	Russell Spotton 213.888.8888	Metal Cigs, Architectural Cigs, and Wood Cigs	Company policy is to NOT use chlorinated solvents for plant worker safety and environmental issues. Tank linings have been damaged and flammability/explosion is a concern if perchloroethylene is used in enclosed areas. Regional cig houses might risk formulating with perchloroethylene.
Cardinal Cigs	Phillip Pierce 818.444.9274	Metal Cigs(99%), Wood Cigs (1%) - until water is required.	Perchloroethylene is not used in their coating formulations and they have no plans ever using perchloroethylene. They are primarily promoting water-based products.

Trail Chemical	Scott Newlander 818.442.4140	Metal and Plastic Cigs (93%), Wood Cigs (5%)	Do not formulate with perchloroethylene and foresee no reason to reformulate in the future. Do not mfg any cleaning solvents. Bill Peters will be back in office (2/14) for a national insight.
Spraylat Corp.	Tim Jones 310.559.2335	Metal Cigs, Wood Cigs, Plastic, Rubber & Glass Cigs	Will not use chlorinated solvents (incl perchloroethylene) due to safety and environmental issues. Currently formulates 94% water-based products and 6% high solids. Concerned with allowable increased use of both perchloroethylene and acetone.

Graphic Arts/Lithographic Ink (RI130) Formulators:

Company Name	Contact	Primary Product	Comment
Superior Printing Ink	Terry 310.327.2884	Lithographic Ink	Perchloroethylene is not used in ink formulations.
INX Inc 1	Danna Graham 213.264.8444 Kevin Fackham 847.734.6650	Lithographic Ink (both paste & liquid)	Perchloroethylene is not used in ink formulations. Do not produce solvent cleaners or degreasers. Primarily use water-based inks. Corporate stance would be NOT to revert to toxic reformulation.
United Printing Ink	Steve Crosby 562.921.1441	Lithographic Ink (for paper, plastic)	Does not use perchloroethylene in ink formulations and does not plan to use perchloroethylene in the future. Perchloroethylene is NOT one of the solvent cleaners used at the facility either.
Ink Systems	Chris Burdock 213.268.5900	Lithographic Ink	Does not use perchloroethylene in the future. Does not plan to use perchloroethylene in ink formulations and would not use a toxic in any formulation.
The Ink Co.	Bill Brock 916.372.2452	Lithographic Ink	Does not use perchloroethylene in ink formulations and would not use a toxic in any formulation.

Boreen Printing (RI130.1) Formulators:

Company Name	Contact	Primary Product	Comment
Aztec Industries	Tony Shumway 602.833.3131	Screen Printing Ink	Is not familiar with perchloroethylene. They apply ink to plastic switches which are sold in so Cal but no ctp done here
Coates Screen	Bernard Barker 909.930.5500	Screen Printing Inks	Perchloroethylene not used in ink formulations. Only using biodegradable products - would not "revert to cancer-causing compounds."
T.W. Graphics	Chuck Tibbitts 213.721.1400	Screen Printing Inks	Formulating ink with perchloroethylene not an option. People cleaning ink spills or undoing misprints on garments might use perchloroethylene

Seicol Ink	Craig Poggenpohl 913.573.3803	Screen Printing Inks	Perchloroethylene or any chlorinated solvents are not used in our ink formulations. Health hazards will prevent us from reformulating with perchloroethylene in the future.
Naz-DarkC	Mike Hammel 714.894.7578 800.258.5050	Screen Printing Inks	Not available for comment.
Summit Screen Inks	Allison Tirschel 800.736.5959	Flat Graphic Arts Inks (paper, plastic products)	Perchloroethylene not used in ink formulations. Will not be reformulating in the future. National ink formulator
Ink Dezine Int'l	Bruce Rivore 416.789.5111	Screen Printing Inks	Perchloroethylene not used in ink formulations.

Adhesive (RI168) Formulators:

Company Name	Contact	Product	Comment
3M	Ellen Scheide, Enviro. 612.733.4116 Bob Norris, Lab Mgr 612.736.8236	Adhesives	Due to health/safety/liability issues, 3M will not use perchloroethylene. Any potential future amount used would be negligible. Other adhesive mfg include Locklight, National Starch and HB Fuller, who is predicted to follow same policy.
IPS Corp	George Bianco 310.898.3300	Adhesives (joining plastic parts)	Presently, do not use very much. Not a good solvent for their product process unlike ketones (such as acetone) or TCA or methyl chloride which would be much more helpful.

Electronic Component Cleaners:

Company Name	Contact	Substrate	Comment
Interlink Electronics	Tom Scroggin 805.484.8855 x119	Electronic Mfg.	They receive their circuit boards already cleaned (with hot water and soap) from other companies.
Cortland	Art Villa 805.499.6877	Cleaning solvent	Circuit boards are cleaned with hot "organic flux" (de-ionized) water. No plan to revert to hazardous materials like perchloroethylene.
Rad	Larry 805.527.2733	Cleaning solvent	Same process as Cortland. They claim to be the only two circuit board cleaners in the basin.

Perchloroethylene is NOT feasible in the following coating formulations:

(per Katy Wolf, Toxicologist, Institute of Research and Technical Assistance)
 Marine Craft Coating (RI106)
 Pleasure Craft Coating (RI106.1)
 Metal Container, Closure, and Coil Coating Operations (RI125)
 Magnet Wire Coating Operations (RI126)
 Paper, Fabric and Film Coating Operations (1128)

NESHAPs should limit toxic usage within the following industries:

INDUSTRY	RULE	COMPLIANCE DATE
Dry Cleaning	R1102.1 / R1421	9/96
Wood Products (>50 lb)	R1116 would include the ~15% architectural R1113 wood product cigs, smaller formulations might reformulate before deadline	11/97
Degreasers	R1122	12/97
Aerospace	R1124	9/98
Chemical Milling	4 aerospace R1124 facilities where 2 have control equipment and 2 have reformulated coatings - all are subject and all are in compliance.	9/98
Maskants	R1136 would include the ~15% architectural R1113 wood product cigs, smaller formulations might reformulate before deadline.	11/98
Printing/Publishing	Rule 1130, 1030.1	5/99

Conclusions: With pending NESHAPs compliance deadlines, large formulators will not bother reformulating only to be forced to lower limits again. Unfortunately, the same does not hold true with smaller coating houses who have smaller operations, fewer customers and more flexible reformulating schedules.

Other Potential Industries and Conclusions:

INDUSTRY	COMMENT
Brake Cleaners	Consumer product frequently used in auto body shops. Not regulated by the District CARB looking into creating an ATCM for brake cleaner formulations which should control the potential increased usage of perchloroethylene.
Chemical Processing	The aerospace rule (Rule 1124 (c)(1)(C)(i)) already exempts perchloroethylene as a VOC in the chemical processing maskant formulations.
Maskants	

APPENDIX E

RESPONSES TO COMMENTS ON THE DRAFT EA



HALOGENATED SOLVENTS INDUSTRY ALLIANCE
2001 Street, NW, Suite 300A Washington, D.C. 20036 • (202) 775-0432 Fax: (202) 331-0981

May 15, 1997

Ms. Tara Tisopulos
Air Quality Specialist
Office of Planning and Policy
South Coast Air Quality Management District
21865 East Copley Drive
Diamond Bar, California 91765-4182

Re: Draft Environmental Assessment for Proposed Amended Rules 102 -
Definition of Terms, 1171 - Solvent Cleaning Operations, and 1302 -
Definitions (New Source Review), addition of perchloroethylene to the
definition of Exempt Compounds.

Dear Ms. Tisopulos:

- 1-1 The Halogenated Solvents Industry Alliance (HSIA) opposes the District's proposal to delay the exemption for perchloroethylene until the effective date of the federal emission standards (NESHAPs) for halogenated solvent cleaning. We also oppose the proposal to add perchloroethylene to the list of Group II Exempt Compounds. Both proposals are based on the flawed assumption that a company's decision to use perchloroethylene is determined solely by the District's regulation of the solvent. Despite evidence to the contrary, moreover, District staff appear to assume that companies in the Basin are unaware of the numerous regulatory and other issues related to the use of this solvent.
- 1-2

Proposal to Delay the Effective Date

- 1-3 The draft Environmental Assessment (EA) asserts that the proposed delay in the effective date "prevents this compound from being unregulated during the period between the proposed project's adoption and the implementation of the NESHAPs." On the contrary, myriad regulations will apply to the use of

1-3
cont.

Ms. Tara Tisopulos
May 15, 1997
Page 2

HSIA/CEC

perchloroethylene during this period, including the requirements of the California Occupational Safety and Health Administration (CalOSHA), the state's Proposition 65 notification requirements, federal and state waste handling and disposal restrictions, and the District's own Rule 1402. Perhaps most notably, CalOSHA's allowable exposure limit of 75 parts per million (8-hour time-weighted average) imposes a significant obstacle to the uncontrolled use of perchloroethylene that District staff seem to fear will result from the exemption.

In addition, the District's own information indicates that companies perceive that the "many liability, safety, and disposal issues surrounding the use of perchloroethylene" preclude its usage. It is clear from such comments that most, if not all, companies are well aware of the concerns related to irresponsible use of the solvent. Other than the unsubstantiated claims of the Institute for Research and Technical Assistance (IRTA), the District has no evidence that these same companies will flock to perchloroethylene if the exemption is granted this summer.

- 1-4
- 1-5 IRTA's January 7, 1997 comments to the District allege that "hundreds of firms" already are using perchloroethylene for solvent cleaning in the basin. This would indicate that the decision to use perchloroethylene has little to do with the District's consideration of the solvent's VOC status. It results, in fact, from a renewed interest in vapor degreasing systems following unsuccessful efforts to use aqueous processes, dissatisfaction with other solvent-based processes, and the pending requirements of the NESHAPs.

- 1-6
- 1-7 Delaying the exemption is not necessary, furthermore, to implement a communications program for the degreasing NESHAPs. As indicated in Appendix B of the draft EA, the District has been engaged in such a program for nearly two years. HSIA believes that, through the efforts of the District and others, awareness of the NESHAP requirements is considerably higher than some have suggested. The current effort to revise Rule 1122 to incorporate the requirements of the federal standards, moreover, provides the District with an excellent opportunity to communicate with those in the industrial community who are not already aware of what they must do.

Proposal to List Perchloroethylene as a Group II Exempt Compound

Listing of perchloroethylene and other substances as Group II Exempt Compounds under Rule 102 is both unnecessary and misleading. Certainly in the case of perchloroethylene (and methylene chloride), toxics regulation at the

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HSIAR/CEC

Mischaracterization of the Carcinogenic Potential of Perchloroethylene

Sincerely,

Stephen P. Risoldo
Director of Regulatory Affairs

OxyChem

May 14, 1997

Tara Tsipulos
South Coast AQUID
21865 E. Copley Drive
Diamond Bar, CA 91765-3102

Occidental Chemical Corporation (OxyChem) appreciate the opportunity to comment on the Proposed Amendment to Rule 102. OxyChem has provided comments regarding clarity, consistency and non-duplication in the attached letter to Mr. Ricardo Rivera dated April 10, 1997. We are providing additional comments to the Draft Environmental Assessment dated April, 1997.

In this document, a letter dated January 7, 1997, from Dr. Katy Wolf to Dr. Anupam Ganguli, discusses several issues related to Rule 102. On page 3 of this letter, Dr. Wolf says:

The provider of PCPWP have indicated that the two cases reviewed by the

The producers of PCBTf have indicated that they have no intention of ever conducting either 90 day subchronic or chronic toxicity testing of their chemical.

[illegible]

While DryChem takes issue with some of Dr. Wolf's statements, we concur with her statement that if the results indicate that the chemicals have low toxicity, then they should be removed from Group 1, category and placed into Group 1A, careful review of the available toxicity data for PCBs. Group 1 indicates that the toxicity is very low and would place it into Group 1. DryChem is requesting that the Agency make this change.

If you have any additional questions, please contact me at 716-278-7894

Sincerely,

**Bernard K. Zyeman,
Technical Service Specialist
Attachment**

BK7023

Occidental Chemical Corporation
P.O. Box 334, Monrovia, CA 94530
Tel: (415) 321-1000 • Fax: (415) 321-1001

OxyChem.

April 10, 1997

Mr. Ricardo Rivera
South Coast Air Quality Management District
Stationary Source Compliance
21865 E. Copley Drive
Diamond Bar, California 91765

Comments: Proposed Amended Rules 102, 1106.1, 1161 and 1302

Dear Mr. Rivera:

OxyChem Chemical Corporation (OxyChem) welcomes the opportunity to comment on the Proposed Amended Rules 102, 1106.1, 1161 and 1302. We continue to strongly support the initial proposal which removed the distinction between Group I and Group II Compounds, and were surprised with the latest proposed amendments to Rule 102.

The new proposal is confusing and inconsistent with three different California Health and Safety Code finding requirements for "Clarity, Consistency and Non-duplication".

A. The proposed rule is not "clear". It should separate and clearly define the three different groups of chemicals, based on these different impacts on the environment:

- Volatile Organic Compounds (VOC) that are ozone precursors,
- Compounds that are VOC exempt based on their low photochemical reactivity,
- Compounds that deplete the stratospheric ozone (ODC).

The criteria for the proposed, and current, Groups I and II are confusing, not clearly defined and are redundant with ODC, to the extent a definition can be inferred. One example of inconsistency is the listing of HCFC 141b in Group I, when its use should be restricted by listing it in Group II as an ODC.

For chemical product users, qualifiers or caveats for listed chemicals are confusing; if in doubt, they will not use Group II compounds. This may result in a missed opportunity to benefit the environment.

The new proposed rule will perpetuate the confusion and the problems created by the present definition of VOC-exempt chemicals that includes two groups. Each rule referencing Rule 102 might have to be updated every time there is a

OxyChem
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Diamond Bar, CA 91765
1-800-321-1651 Fax: 714-713-7225

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CONT.

change in the VOC-exempt listing, and this may cause inadvertent prohibition of using exempt compounds. This happened with parathionchloride (PCBTF), a VOC-exempt compound sold by OxyChem under the trade name OXSOL-100, which was not allowed to be used under Rule 1106.1 (G)5 and Rule 1151 (c)(2), because it is listed in Group II. The current proposed amendments to rules 1151 and 1106.1 will correct this situation, but elimination of Group I and II would have achieved the same result without the need for the administrative amendments.

B. The Group II definition is not "consistent" and not in harmony with federal regulations in 40 CFR 61.100(a) which define a single category of VOC-exempt compounds based solely on their photochemical reactivity.

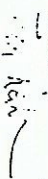
C. The proposed restriction on the use of Group II compounds is a "duplication" of other regulations which already restrict their use based on toxicity. Many other regulations address toxicity and hazards at federal, state and district level, such as OSHA Hazard Communication, EPA-Clean Air Act Hazardous Air Pollutants, SARA 313, California rules: Proposition 65, AB 2388, District rules 1401, 1402, etc.

D. Please correct Page 5 of Staff report: PCBTF is a combustible liquid, not a flammable gas.

E. Please review the adequacy of including carbon tetrachloride in the notes on the Group II, on page 4 of the rule.

F. We ask that you extend the comment period, until May 15, to allow for additional comments.

Sincerely,



Tora Reinholm
Senior Regulatory Specialist
TR010

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COMMENT LETTER ONE
HALOGENATED SOLVENTS INDUSTRY ALLIANCE
MAY 15, 1997

1-1 The original project proposal for Rule 102 included an implementation date consistent with rule amendment adoption. A preliminary analysis of this date, along with comments received, indicated that there could be increased perchloroethylene usage between rule adoption and December 1997, which is the date of the federal National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Degreasing Operations. Even if only a slight increase in perchloroethylene usage would occur, December 1997 would remain the environmentally superior alternative. Therefore, staff decided to shift the implementation date to December 1997 to coincide with the implementation date of the federal NESHAPs.

The commentator points out in subsequent paragraphs as well as a previous comment letter that de-listing perchloroethylene will not result in increased usage. The SCAQMD agrees with this assertion. The SCAQMD is unclear, therefore, why the commentator is requesting an implementation date of June 1997. There is only a six month window of time between June and December and since no increased usage is expected to occur, it is irrelevant what implementation date is selected. The SCAQMD believes that December 1997 is the more appropriate date due to the additional regulation that will be in place and to alleviate any industry confusion regarding which rules are being enforced and when. December 1997 is, therefore, the environmentally superior alternative.

1-2 Rule 102 currently states the following relative to Group II Exempt Compounds:

The use of Group II compounds and/or carbon tetrachloride may be restricted in the future because they are either toxic, potentially toxic, upper-atmosphere ozone depleters, or cause other environmental impacts.

The SCAQMD is aware of the fact that perchloroethylene is regulated by public agencies other than the SCAQMD. Perchloroethylene is proposed for listing as a Group II compound because it is recognized as a Toxic Air Contaminant (TAC) by both the Air Resources Board (ARB) and the U.S. Environmental Protection Agency (EPA) that may be further restricted by the SCAQMD or another regulatory agency. The SCAQMD has no way of confirming that every source using perchloroethylene in the South Coast Air District is being regulated. There could be potential new source of perchloroethylene usage that the SCAQMD is completely unaware of or that may occur in the future. Therefore, a new NESHAPs or an amendment to SCAQMD Rule 1401 to include perchloroethylene are feasible. These types of regulatory actions would be further restrictions that a consumer or company should be aware of when deciding to use perchloroethylene.

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Classification as a Group II compounds places absolutely no restriction on the usage of the compound. The classification is meant to inform SCAQMD's constituents that other regulations could apply to these compounds in the future. Therefore, perchloroethylene will remain exempt from the definition of Volatile Organic Compound (VOC) but will remain as a Group II exempt compound.

1-3 Please refer to the response to comment #1-1.

1-4 The SCAQMD is not assuming that companies will flock to perchloroethylene. The fact that the EA prepared for Rule 102 did not identify significant adverse environmental impacts indicates that the SCAQMD has not identified a massive shift to perchloroethylene usage. Research conducted for this rule amendments (see Appendix D) shows little interest in a shift to perchloroethylene throughout the district. However, the implementation date is proposed for December 1997 to ensure that all existing toxic regulations are in place to offset any, if even slight, increases in usage as a result of the amendments. By proposing the December 1997 implementation date, the SCAQMD is merely avoiding any unnecessary confusion and possible increase in perchloroethylene usage between June 1997 and December 1997.

Assertions made by other commentators, such as the Institute for Research and Technical Assistance (IRTA), are evaluated for merit by the SCAQMD, as was done with the previous HSI/A comment letter. The delay in the implementation date was not only an IRTA suggestion but also a staff recommendation for the reasons outlined earlier. The recommendation to move the implementation date to December 1997 was considered to have substantial merit because of IRTA's experience moving industries away from organic solvents.

The commentator is also referred to the response to comment #1-1.

1-5 The decision by an industry to use perchloroethylene is based upon a number of factors as implied by the commentator. If facilities are already moving to perchloroethylene as a result of "renewed interest in vapor degreasing systems," then it seems reasonable that delisting perchloroethylene could contribute to an owner/operator's decision to use perchloroethylene because it would no longer be regulated as a VOC. Consequently, it is a reasonable precaution to tie the implementation date for delisting perchloroethylene to the implementation date for the solvent degreaser NESHAP.

Please refer to the response to comment #1-1.

1-6 The SCAQMD will continue its outreach program to ensure that there is no misunderstanding regarding which rules are applicable and for which sources. The implementation date shift gives the SCAQMD time to further this message and helps eliminate any conflicting dates and requirements. This outreach program is consistent with

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the SCAQMD's Governing Board direction for extensive outreach and interaction in the district, particularly for small businesses.

The schedule for Rule 1122 amendments has been revised and will now be presented to SCAQMD's Governing Board in August 1997. The SCAQMD's Rule 1122 Advisory Panel has been meeting with this affected industry and will continue meeting with this industry throughout this rule amendment process to ensure that information about Rule 1122 and the NESHAP is widely disseminated.

1-7 The SCAQMD disagrees with the commentator's opinion that listing perchloroethylene and other substances as Group II Exempt Compounds is both "unnecessary and misleading." The two groups were originally established by the SCAQMD's Governing Board in order to eliminate confusion with the public regarding what it meant to be a VOC-exempt compound. Inclusion as a Group II compound is merely a notification to consumers that, even though a compound is not considered a VOC, it may have other adverse health or environmental effects. Perchloroethylene is a TAC and, therefore, it is being included in Group II. It is regulated at several levels now but that in no way precludes the SCAQMD, EPA, OSHA, etc., from further regulating it in the future.

Being classified as a Group II compound in no way restricts a compound's usage or means that it is treated any differently than any other VOC-exempt compound.

1-8 Thank you for your comment. Chapter One of the Final EA will be corrected to reflect this change.

RESPONSE TO COMMENT LETTER TWO

OXY CHEM
MAY 14, 1997

2-1 The issues addressed in the attached letter sent to Mr. Ricardo Rivera, dated April 10, 1997, have been responded to in the Staff Report for Rule 102. Therefore, no responses to these issues are included in this Final EA.

2-2 At the December 1995 Board hearing on previous amendments to Rule 102, the manufacturer of parachlorobenzotrifluoride (PCBT), Occidental Chemical Corporation requested that this compound be moved to the list of Group I VOC-exempt compounds. The SCAQMD did not have any toxicological data at the time to make a determination about the compound. Therefore, the SCAQMD requested that the manufacturer submit data to the SCAQMD verifying its assertion that there was very low toxicity associated with this compound.

The SCAQMD is not disagreeing with the commentator that all of these tests could have been performed on PCBT. However, the SCAQMD is currently only in possession of a "Health and Environmental Effects Summary" which was submitted to the SCAQMD on April 18, 1997. This summary does not provide the SCAQMD with sufficient data necessary to make a determination of low toxicity. The report was submitted to SCAQMD Health Effect Officer Dr. Shankar Prasad. In an April 18, 1997, letter to Dr. Prasad with the attached report, Oxy Chem states the following: "Additional toxicological work has been completed, including an inhalation model which allows one to extrapolate tissue doses (liver, kidney, muscle, fat, brain, etc.) from the rat to humans. Manuscripts were recently submitted to Inhalation Toxicology for publication and I will forward them to you as soon as they become available." This statement leads the SCAQMD to believe that PCBT research has not been concluded at this time.

Statements made in other comment letters submitted on Rule 102 may, in fact, be incorrect. However, the SCAQMD is not the author of these comments and makes no indication of support or agreement with any comments submitted. As stated previously, Oxy Chem may have conducted several toxicological tests on PCBT. The SCAQMD is not in possession of these test results at this time.

2-3 The SCAQMD does not agree that PCBT should be moved to the Group I Exempt Compound list at this time, due to a lack of data supporting the low toxicity. The SCAQMD is more than happy to continue working with Oxy Chem to determine what data are still outstanding and the best way to retrieve it.

2-4 The commentator is referred to the response to comment #2-1.