December 19, 2016

Via Electronic Mail (SNakamura@aqmd.gov)

Ms. Susan Nakamura
Acting Assistant Deputy Executive Officer
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, California 91765-4182

Re: Proposed Rule 1430 – Control of Emissions from Grinding Operations at Metal Forging Facilities

Dear Ms. Nakamura:

The Independent Lubricant Manufacturers Association ("ILMA" or "Association") submits the following comments on the South Coast Air Quality Management District’s ("SCAQMD") pre-rulemaking draft Proposed Rule 1430 - Control of Emissions from Grinding Operations at Metal Forging Facilities. These comments supplement the Association’s December 9, 2016 letter.

Definitions

ILMA requests that SCAQMD augment its current pre-rulemaking draft Proposed Rule to reflect the following two definitions for “flood application” and “Minimum Quantity Lubricant.”

Flood Application (of Metalworking Fluids for Grinding Metal Parts):

Flood application is the application of a metalworking fluid applied at the grinding wheel/work piece interface that meets all or part of the following conditions and is sufficient to suppress dust, reduce heat and spark generation at the point of cut:

1. Applying the metalworking fluid at a velocity of three (3) feet per second or greater;
2. Applying the metalworking fluid at a volume flow rate of one (1) US gallon per minute or greater; and,
3. Applying the metalworking fluid whereas the nozzle application tip pressure is ten (10) pounds per square inch gauge (PSIG) or greater.

President, Beth Ann Jones, Hangsterfer’s Laboratories, Inc.
Vice President, Dave Croghan, Maxum Petroleum
Treasurer, Barbara Kudis, Allegheny Petroleum Products Company
Secretary, Chuck Deckov, American Oil & Supply International LLC

Immediate Past President, Frank H Hamilton II, South Atlantic Services, Inc.
Chief Executive Officer, Holly Alfano
General Counsel, Jeffrey L. Leiter
Minimum Quantity Lubricant:

A Minimum Quantity Lubricant (MQL) is a lubricant, not a coolant, and does so in "minimum quantities." MQL coats the tool workpiece interface with a thin film of lubricant and minimizes heat buildup through friction reduction. MQL fluids can be applied by pre-coating the tool in the MQL fluid or by direct application at the tool workpiece interface with a fine mist. MQL fluids are not well suited for grinding operations since grinding processes generate significant heat at the point of cut. Thus more cooling is required than lubricity.

These definitions will ensure that forging operations utilize an appropriate volume of metalworking fluids and that those fluids are applied properly.

* * *

ILMA requests that the definitions above be included in the text of Rule 1430 as well as the modification to the applicability section outlined in the Association’s December 9, 2016 letter.

Sincerely,

Holly Alfano
CEO