

ADVISORY NOTICE

Important Notice to All Manufacturers, Suppliers and Users of Metalworking
Fluids and Direct-Contact Lubricants
Clarification of Allowable use of Consumer Product Lubricants regulated by CAPR at Eacilities

Clarification of Allowable use of Consumer Product Lubricants regulated by CARB at Facilities Subject to AQMD Rule 1144 – Metalworking Fluids and Direct-Contact Lubricants

The South Coast Air Quality Management District has been made aware of a possible misinterpretation of Rule 1144 pertaining to its applicability to consumer product lubricants regulated by CARB.

Rule 1144 applies to fluids that either 1) evaporate off shortly after use (vanishing oils) or 2) serve to inhibit or prevent corrosion of metal (metal protectants/rust inhibitors) or 3) are used during metalworking and/or metal forming operations (metalworking fluids). These fluids are typically used at steel tube and spring manufacturers, steel mills, aerospace manufacturers, automobile part manufacturers and rebuilders, as well as machine shops for broaching, drilling, drawing, heading, honing, forging, milling, stamping, tapping, threading and turning operations.

Effective January 1, 2011, the exemption for the VOC content of consumer products used as metalworking fluids or direct-contact lubricants at industrial facilities expired. Typically, VOC limits for consumer products are higher than industrial applications regulated under Rule 1144. As a result, they are no longer allowed to be used by industrial facilities for the manufacturing and assembly of products.

However, consumer product lubricants such as multi-purpose lubricants are still allowed to be used by the industrial facility for purposes of repair, maintenance or research conducted within the facility. Moreover, these consumer product lubricants may be used by commercial, institutional or household users where no manufacturing occurs to assemble premade parts in establishments such as retail stores, distribution centers and repair shops.

Comments or questions regarding Rule 1113 should be directed to areasources@aqmd.gov or call the Area Source team at 909-396-2390.