Proposed Amended Rule 1171 Solvent Cleaning Operations

Working Group Meeting #3 February 26, 2025



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Agenda



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Rule 1171 Background

- Adopted in August 1991 to limit VOC emissions from solvent cleaning operations
- Applicable to:
 - Users and suppliers of solvents used as part of a cleaning operation
 - Cleaning operations where solvents are used
 - Wide array of industries including textiles, electronics, chemical, lumber, printing, metal, and other miscellaneous manufacturing
- Last amended in May 2009 to extend compliance date for certain operations and exempt certain smallusage, low-emissions applications



Rule Amendment Objectives

- Rule development initiated in response to:
 - South Coast AQMD Stationary Source Committee directive to prioritize reducing exposure to toxic solvents, such as tertbutyl acetate (t-BAc) and para-chlorobenzotrifluoride (pCBtF)
 - Assembly Bill 617, which requires agencies to establish community-focused and community-driven plans to reduce air pollution and improve public health in designated environmental justice communities
 - South Los Angeles Community Emission Reduction Plan includes reducing emissions from auto body shops
 - Stakeholder concerns regarding solvent availability for critical cleaning at water and electricity distribution operations



Working Group Meeting #2 Summary

- WGM #2 held on May 29, 2024
- Rule amendment was temporarily on hold due to staffing resources
- During WGM #2 the following topics were discussed:
 - Staff's evaluation and findings of the use of t-BAc and pCBtF in solvent cleaning operations across auto body, auto repair, and printing industries
 - Auto repair industry use of aerosol solvent cleaning products and potential rule concepts
 - Best management practices for spray gun cleaning activities at auto body refinishing facilities
 - Use of liquid alcohols for cleaning at water and electricity utility facilities and potential rule concepts
 - t-BAc and pCBtF prohibition

t-BAc and pCBtF Background



Exempt Compounds

- Certain solvents are defined as exempt from the definition of a VOC by the U.S.
 EPA if they are negligibly photochemically reactive
 - Defined as less reactive than ethane
- Exempt compounds are not considered toward the VOC content of regulated materials
- U.S. EPA does not consider toxicity when making their designation

South Coast AQMD's Defined Exempt Compounds

- South Coast AQMD considers compounds designated as exempt by the U.S. EPA but also considers the toxicity, ozone depletion potential, or other environmental impacts
- Rule 102 Definition of Terms, classifies exempt compounds into two groups
 - Group I: exempt compounds that are not expected to be restricted in the future
 - Group II: exempt compounds that are prohibited from use in many VOC rules because of toxicity or other environmental impacts
- South Coast AQMD sometimes includes limited exemption in source specific rules to address potential toxicity concerns

Rule 102 (Cont.)

(Amended January 10, 2020)

(B) Group II

methylene chloride (dichloromethane) 1,1,1-trichloroethane (methyl chloroform) trichlorofluoromethane (CFC-11) dichlorodifluoromethane (CFC-12) 1,1,2-trichloro-1,2,2-trifluoroethane (CFC-113) 1,2-dichloro-1,1,2,2-tetrafluoroethane (CFC-114) chloropentafluoroethane (CFC-115) cyclic, branched, or linear, completely methylated siloxanes (VMS) tetrachloroethylene (perchloroethylene) ethylfluoride (HFC-161) 1,1,1,3,3,3-hexafluoropropane (HFC-236fa) 1,1,2,2,3-pentafluoropropane (HFC-245ca) 1,1,2,3,3-pentafluoropropane (HFC-245ea) 1,1,1,2,3-pentafluoropropane (HFC-245eb) 1,1,1,3,3-pentafluoropropane (HFC-245fa) 1,1,1,2,3,3-hexafluoropropane (HFC-236ea) 1,1,1,3,3-pentafluorobutane (HFC-365mfc) chlorofluoromethane (HCFC-31) 1,2-dichloro-1,1,2-trifluoroethane (HCFC-123a) 1 chloro-1-fluoroethane (HCFC-151a)

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. By January 1, 1996, chlorofluorocarbons (CFC), 1,1,1-trichloroethane (methyl chloroform), and carbon

Regulatory Timeline



Office of Environmental Health Assessment (OEHHA) released draft Health Risk Assessment (HRA) for t-BAc – found to be more toxic than previously believed

2017

2015



South Coast AQMD staff drafted t-BAc white paper regarding partial exemption of t-BAc as a VOC and presented findings to Stationary Source Committee, who directed staff to prioritize toxicity over emission reductions if confirmed as a carcinogen

2018

OEHHA finalized t-BAc HRA, concluding poses potential cancer risk to humans, South Coast AQMD requested OEHHA evaluate toxicity of pCBtF

2020

OEHHA finalized pCBtF HRA, concluding pCBtF poses greater cancer risk to humans than t-BAc

How to Address t-BAc and pCBtF



Cancer Potency Factors

- Cancer Potency Factors (Slope Factor) for four compounds with toxic endpoints are shown here
- Cancer Potency Factor is a measure used to estimate the risk of cancer associated with exposure to a carcinogenic substance and represents the increased cancer risk per unit of exposure over a lifetime
- pCBtF has the highest Cancer Potency Factor of all compounds and almost 50% more than perchloroethylene, a Group II Exempt Compound



Reference Exposure Levels

- Reference Exposure Level (REL) is the maximum concentration level of a substance in the air not expected to have adverse health effects in humans over a specified exposure duration
 - RELs can be acute (short-term), 8-hour, or chronic (long-term)
- Acute REL for the same previous compounds shown
- t-BAc has the lowest REL meaning the highest risk among the four compounds
- Cancer Potency Factor for pCBtF is much higher than t-BAc, perchloroethylene, and Dimethyl Carbonate (DMC)
 - There is no established REL for pCBtF



Staff's Conclusion

Additional modeling supported the Stationary Source Committee's recommendation to remove the VOC exempt status of t-BAc

OEHHA's assessment of t-BAc and pCBtF shows compounds to be as toxic as many chemicals currently prohibited

Staff recommended prohibiting the use of t-BAc and pCBtF

Actions taken to date by South Coast AQMD:

- Staff is working on phasing out the use of t-BAc and pCBtF and will conduct a case-by-case assessment of each rule and product category to determine the best approach
- Amended Rule 1168 (adhesives rule) in 2022 and Rule 1151 (automotive coatings rule) in 2024 to Phase out pCBtF and t-BAc
- Currently amending three rules to address pCBtF and t-BAc toxicity
 - Rule 1107 Coating of Metal Parts and Products
 - Rule 1124 Aerospace Assembly and Component Manufacturing Operations
 - Rule 1136 Wood Products Coatings

t-BAc and pCBtF-use in Solvent Cleaning

- Solvent cleaning materials can be formulated with exempt compounds to comply with South Coast AQMD VOC limits
 - Acetone is an exempt solvent commonly used for cleaning and does not have any known toxicity concerns
 - t-BAc and pCBtF are used less often
 - t-BAc is not exempt for solvent cleaning
 - pCBtF is an expensive solvent not frequently used for cleaning
- Based on stakeholder feedback:
 - No industries rely solely on t-BAc or pCBtF-containing solvents to conduct solvent cleaning operations
 - Some t-BAc and pCBtF-containing solvent cleaning materials are used but alternatives are commercially available and widely used



Key Concerns From Working Group Meeting #2

Key Concerns

Two Main Key comments Related to Aerosol Exemption

Concern from Auto Repair Facilities Concern from Electric and Water Distribution Facilities

Key Concern #1: Automotive Repair Facilities

- Majority of solvents used for washing automotive parts are water based and comply with the 25 g/L VOC limit
- Stakeholders expressed concern regarding:
 - Small cleaning operation such as adhesive removal and battery terminal cleaning (~ 75 ounces/year)
 - Intake system/throttle cleaning operations (~4,500 ounces/month)
- Both cleaning operations use aerosol cleaners with VOC content greater than >25 g/L
- No low-VOC alternatives identified for small cleaning and intake/throttle body cleaning
- Current rule exempts 160 ounces per day or less, which may not reflect current operational needs
 - Equivalent monthly allowance would better fit needs
- Staff proposing to revise current exemption to reflect operational needs of automotive repair facilities





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Key Concern #2: Electric Utilities and Water Distribution Facilities

- Electric utilities and water distribution facilities have been meeting some cleaning needs using exempt aerosolized alcohol cleaners
 - Manufacturer specifications require alcohol-based cleaners
- Expressed concern over the availability of aerosol cleaners
- Requested option to use liquid alcohols instead of aerosols for cleaning:
 - Circuit breakers
 - Ozone generators, UV sterilization systems, chlorine systems
- Staff proposing to allow limited use of non-aerosol alcohol cleaners for specific equipment
 - Considering including alternative reactivity-based VOC limits to mitigate ozone impacts



Reactivity-Based VOC Limits

Reactivity Based Standards

- The future phase out of t-BAc and pCBtF presents challenges for reducing VOC emissions
- Staff is considering reactivity-based standards in several VOC rules
- Provide flexibility to solvent suppliers and manufacturers while reducing air quality impacts
- Recently adopted Rule 1151 Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations, included:
 - Several optional alternative reactivity-based standards
 - Required reactivity-based standards for reducers or thinners

Mass-Based versus Reactivity limits

- Mass-based VOC limits treat all solvents equally other than water and exempts solvents which are not considered VOCs
- Reactively-based limits are weighted averages based on the Maximum Incremental Reactivity (MIR) value of each solvent
- CARB uses reactivity-based limits for aerosol coatings

Table of Reactivity Limits Product-Weighted MIR in Grams Ozone per Gram Product (g O_3 / g product)

Aerosol Coating Category

General Coatings	06/01/2002	01/01/2017
Clear Coating	1.50	0.85
Flat Coating	1.20	0.80
Fluorescent Coating	1.75	1.30
Metallic Coating	1.90	1.25
Nonflat Coating	1.40	0.95
Primer	1.20	0.70
Specialty Coatings (A)	01/01/2003	01/01/2017
Auto Body Primer	1.55	0.95
Electrical/Electronic/Conformal Coating		2.00
Exact Match Finish:		
Automotive	1.50	0.95
Engine	1.70	0.95
Industrial	2.05	1.20
Flexible Coating		1.60
Ground Traffic/Marking Coating	1.20	0.85
Mold Release Coating		1.10
Two Component Coating		1.20
Uniform Finish Coating		1.30

MIR Values of Some
Common Solvents

- Reactivity-based limits would require manufacturers to choose solvents with lower MIR
- Could allow formulators more flexibility

Compound	MIR
2-pentenes	10.47
o-xylene	7.64
butanal	5.97
toluene	4.00
ethanol	1.53
MEK	1.48
nonane	0.78
methanol	0.67
isopropyl alcohol	0.61
tert-Butyl alcohol	0.41
benzaldehyde	0.00
acetone	0.36
pCBtF	0.13
methyl acetate	0.07
D4	0.00

Impact of Reactivity

Automotive Spray Gun Cleaner

Solvent	Weight Percent	MIR	Weighted Average
Ethanol	1%	1.5	0.02
C7 Alkane	19%	1.5	0.3
Toluene	20%	4.0	0.8
THF	2%	4.3	0.1
Methanol	30%	0.7	0.2
Methyl			
Acetate	20%	0.07	0.01
	100%	(1.4

- Examples of solvent selection impact on reactivity
- Second example will produce almost 3 times more ozone than the first example

Electrical Cable Cleaning Solution

Solvent	Weight Percent	MIR	Weighted Average
Acetone	50%	0.4	0.2
PA	50%	0.6	0.3
	100%	(0.5



Considerations for MIR Standard in Proposed Amended Rule 1171

Considering Product Weighted MIR limit tied with the low-use limits for solvent cleaning at Electric Utilities and Water Distribution Facilities

- Would limit ozone formation of cleaning solvents
- Allow for the use of lower-MIR alcohol-based cleaners
- Open for discussion on proposal

Considering Product Weighted MIR for the printing industry

• Open to further discussions

Preliminary Rule Concepts

Aerosol Exemption

- Automotive Repair, electricity and water distribution industries rely on the aerosol exemption, which allows for the use of up to 160 fluid ounces of non-compliant product per day per facility
- Staff is proposing to retain the aerosol allowance but move it to an alternative compliance section and make several adjustments to the provision

Existing exemption in paragraph (g)(4)

(4) Cleaning with aerosol products shall not be subject to the provisions of paragraph (c)(1) and paragraph (d)(1) if 160 fluid ounces or less of noncompliant aerosol products are used per day, per facility. The use of such product shall comply with CARB regulations.

Alternative Compliance Options for Auto Repair Facilities

- Auto repair facilities rely on aerosol exemption to clean specific engine components
 - Highest use is for throttle body and intake (3) systems
 - Limited use for other cleaning
- Stakeholders requested a monthly allowance instead of the daily allowance:
 - Provide flexibility
 - Better reflect typical aerosol product usage within industry
- Staff proposing to retain aerosol allowance for solvent cleaners with an equivalent monthly usage for throttle body and intake cleaners, lower allowance for other cleaning

- Alternative Limits for Aerosol Cleaning

 Facilities conducting Solvent Cleaning Activities listed in Table 3 may use

 Aerosol Solvent Cleaners that exceed the VOC limits in paragraph (d)(1)

 provided:
 - (A) The Facility complies with the applicable volumetric usage limit(s) listed in Table <u>3</u>:
 - (B) The Facility maintains monthly purchase and usage records on-site for a minimum of five years; and
 - (C) The use of such products complies with California Air Resources Board (CARB) regulations.

Alternative Compliance Options (cont.)

- Table 3 shows proposed aerosol solvent cleaner usage limits
- Proposing to carve out automotive part cleaning
 - Most common solvent cleaning activity
- Proposing to limit other aerosol solvent cleaning to 160 fluid ounces per year, instead of per day to limit the use of noncompliance aerosol solvent cleaning
- Staff looking for feedback

Solvent Cleaning Activity	Usage Limits
(A) Automotive Parts	
(i) Throttle Body and Intake Systems	4,800 fluid ounces per month
(ii) All Other Automotive Part Cleaning	32 fluid ounces per month
(B) All Others Solvent Cleaning Activities	160 fluid ounce per year

Table 3 – Aerosol Solvent Cleaner Usage Limits

Considerations for Cleaning Electricity distribution and water distribution

- Electricity distribution and water distribution industry expressed concerns regarding availability of alcoholbased aerosol cleaners
- Facilities would like to transition from alcohol-based aerosol cleaners to liquid alcohol cleaners
 - Liquid cleaning is generally less emissive than aerosol cleaning
- Staff is proposing to allow limited use of liquid alcohols for cleaning specific equipment and include a product weighted-MIR limit
 - MIR limit would ensure cleaning solvents would not produce more ozone than what is currently used
- Staff does not anticipate any impacts on emissions
 - Allowance limited to current usage volumes
 - No change in solvent cleaning material used
 - Only change would be from aerosol to liquid

- (2) Alternative Limits for Electricity Generating or Distribution Equipment and Water Distribution Equipment
 Facilities conducting Solvent Cleaning Activities listed in Table 2 may use Solvent Cleaning Materials that exceed the VOC limits in paragraph (d)(1) provided:
 - (i) The Facility uses no more than the annual volumes listed in Table 2;
 - (ii) The Solvent Cleaning Materials have a PW-MIR less than those listed in Table 2; and
 - (iii) The Facility maintains monthly purchase and usage records on-site for a minimum of five years.

Alternative Compliance Options (cont.)

- Volume-based limits in Table 2 based on stakeholder feedback
- Product Weighted-MIR aligns with current alcohol-based cleaning solvent being used

TADIC 2 - AUCI HALIVE USAGE AND WITH LIMITS									
Solvent Cleaning Activity	<u>Usage</u> <u>Limits</u> (gallons per year)	<u>PW-MIR</u>							
(A) Electricity Generating or Distribution Equipment									
(i) Circuit Breakers and Circuit Breaker Components	<u>70</u>	<u>0.6</u>							
(B) Water Distribution Equipment									
(i) Chlorination Systems	<u>5</u>	<u>1.5</u>							
(ii) Ozone Generators	<u>30</u>	<u>0.6</u>							

Table 2 – Alternative Usage and MIR Limits

Proposed Prohibition Language

Volatile Methylated Siloxane (VMS) Background

- Cyclic, branched or linear, completely methylated siloxanes are defined Group II Exempt Compounds in South Coast AQMD Rule 102 – Definition of Terms
 - Exempted by U.S. EPA in 1994 due to negligible photochemical reactivity
- Cyclic and linear VMS compounds can be used in solvent cleaning materials and consumer products
- Can be present in trace amounts as byproduct or contaminant in silicone-based coatings
- OEHHA has little toxicity data collected
- Use of VMS-containing products heavily restricted in European Union
 - Octamethylcyclotetrasiloxane (D4)
 - Decamethylcyclopentasiloxane (D5)
 - Dodecamethylcyclohexasiloxane (D6)

VMS Considerations

- Use of VMS-containing products is restricted in other rules, including Rule 1151
- Staff is aware of a small number of solvent cleaning materials that contain VMS
- VMS-containing solvent cleaning materials not believed to be widely used
 - VMS solvents are relatively expensive
 - Alternative products commercially available and widely used
- Staff considering proposing similar language included in Rule 1151

RULE 1151.

MOTOR VEHICLE AND MOBILE EQUIPMENT NON-ASSEMBLY LINE COATING OPERATIONS

(7) Carcinogenic Materials and Exempt Compounds

No person shall manufacture, supply, sell, offer for sale, market, blend, distribute, package, or repackage a Regulated Product for use within the South Coast AQMD, or apply any Regulated Product within the South Coast AQMD, that contains any of the following chemicals in concentrations greater than the limits indicated:

- (A) 1.0 ppm of <u>cadmium;</u>
- (B) 5.0 ppm of hexavalent <u>chromium;</u>
- 0.01 percent by weight of Group II Exempt Compounds, excluding volatile methylated siloxanes (VMS):
- D) 0.1 percent by weight of any <u>VMS</u>;
- (E) 0.01 percent by weight of pCBtF and t-BAc for Regulated Products subject to the applicable Phase I or Phase II VOC limits; or
- (F) 0.01 percent by weight of pCBtF and t-BAc pursuant to the applicable effective dates in Table 4.

Proposed t-BAc and pCBtF Prohibition Language

- Staff is proposing a prohibition effective date of ⁽³⁾ January 1, 2026, after which solvent cleaning materials containing t-BAc or pCBtF may no longer be supplied for use in South Coast AQMD
- Some t-BAc and pCBtF-containing solvent cleaning materials are used but alternatives are commercially available and widely used
- Staff is evaluating potential need for a usethrough date and may propose one at a later time

Carcinogenic Materials and Exempt Compounds

A person shall not perform solvent cleaning activities<u>Solvent Cleaning</u> <u>Activities</u> or operations subject to the provisions of this rule with any material which<u>that</u> contains <u>any of the following chemicals in</u> <u>concentrations greater than the limits indicated:</u>

- (A) 0.01 percent by weight of Group II exempt compounds listed in Rule 102Exempt Compounds, except cyclic, branched, or linear, completely methylated siloxanes (VMS);
- (B) 0.1 percent by weight of any combination of VMS; or
- (C) 0.01 percent by weight of para-Chlorobenzotrifluoride (pCBtF), CAS 98-56-6, or tertiary-Butyl Acetate (t-BAc), CAS 540-88-5, beginning January 1, 2026.

Other Rule Changes

Key Definition Changes

- (5159) SOLVENT <u>CLEANER OR SOLVENT CLEANING MATERIAL ismeans</u> a <u>VOC-containing</u> liquid <u>substance</u> used to perform <u>solvent cleaningSolvent</u> <u>Cleaning</u>.
- (60) SOLVENT CLEANER SUPPLIER means any person who sells and delivers or arranges to deliver Solvent Cleaning Materials to a facility subject to this rule.
- (5261) SOLVENT CLEANING ismeans the use of a Solvent Cleaner or Solvent Cleaning Material for the removal of loosely held uncured adhesives, uncured inks, uncured coatings, and contaminants whichthat include, but are not limited to, dirt, soil, and grease from parts, products, tools, machinery, equipment, and general work areas. Each distinct method of Solvent Cleaning cleaning in a cleaning process, which consists of a series of cleaning methods, shall constitute a separate solvent cleaningSolvent Cleaning operationActivity.
- (62) SOLVENT CLEANING ACTIVITY means a distinct method of cleaning, or a series of distinct cleaning methods, in a Solvent Cleaning process or single event.
- (63) SOLVENT CLEANING OPERATION means a Solvent Cleaning Activity or Solvent Cleaning Activities conducted as part of a business or a public service.

Key Definition Changes

Revised key definitions

- Solvent Cleaner or Solvent Cleaning Materials
- Solvent Cleaning
- Solvent Cleaning Activity
- Electron Beam Ink, and Ultraviolet Ink
 - Combined into new Energy Curable Ink definition

Removed unused definitions

- Architectural Coating
- Clean Air Solvent
- Clean Air Solvent Certificate
- Solvent Flushing, and Wipe Cleaning
 - Only used once, removed from definitions subdivision and defined when referenced

Subdivision (f) – General Prohibitions (cont.)

(7) Prohibition of Possession

Solvent Cleaning Materials that do not meet the requirements of this rule and are used, intended for use, or labeled for use, for Solvent Cleaning Activities shall not be kept on-site, unless the Facility is complying with the paragraph (e)(1) Alternative Compliance Option using an Emission Control System.

- Added language prohibiting use of solvent cleaning materials in which documentation confirming the VOC content and additional info cannot be provided
- Added language prohibiting the possession of non-compliant solvent cleaning materials
- Similar prohibition included in other South Coast AQMD VOC rules, such as Rule 1151

Key Changes to Test Methods

- Moved Test Methods 313
 - Now in paragraph (h)(1)(C) for Determination of VOC Content
 - Corrected test method name
- Removed Test Methods 308
 - Outdated test method no longer used by the South Coast AQMD laboratory

(2) Determination of Presence of VOC in Cleaning Materials

The presence of VOC in the headspace over the cleaning material shall be determined by SCAQMD Test Method 313 [Determination of Presence of Volatile Organic Compounds (VOC) in a Headspace] contained in the SCAQMD "Laboratory Methods of Analysis for Enforcement Samples" manual.

The presence of VOC in liquid cleaning materials shall be determined by SCAQMD Method 308 (Quantitation of Compounds by Gas Chromatography) contained in the SCAQMD "Laboratory Methods of Analysis for Enforcement Samples" manual.

Next Steps

Next Steps

Release Preliminary Draft Rule Language and Staff Report

Continue to hold meetings with Stakeholders

Public Workshop anticipated for end of March

Anticipated Public Hearing – June 6, 2025 (subject to change)

Working Group Materials

• Working group materials for each working group meeting will be made available: https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules

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