



April 11, 2025

Sent via email to: Chris Bradley [cbradley@aqmd.gov](mailto:cbradley@aqmd.gov)

South Coast Air Quality Management District  
Attn: Planning, Rule Development, and Implementation  
21865 Copley Drive  
Diamond Bar, CA 91765

**Re: PROPOSED AMENDED RULE 1171 – SOLVENT CLEANING OPERATIONS**

Clean Water SoCal appreciates the opportunity to comment on the Proposed Amended Rule 1171 – Solvent Cleaning Operations.

Clean Water SoCal represents over 80 public water/wastewater agencies in Southern California. Clean Water SoCal members provide essential water supply, wastewater treatment and water disinfection for approximately 20 million people in San Diego, Orange, Los Angeles, Santa Barbara, Riverside, San Bernardino, and Ventura counties. Our members provide environmentally sound, cost-effective management of more than two billion gallons of wastewater each day and, in the process, convert wastewater into resources for beneficial uses such as recycled water and renewable energy.

We respectfully request that essential public water treatment facilities be exempt from this rule.

The amount of solvents needed to clean water disinfection systems vary widely with the size (capacity) of the treatment facility and the amount of water disinfected. This is not a one size fits all application. Water disinfection system operators need to use alcohols to clean ultraviolet bulbs and ozone generators. They are not able to use low VOC solvents like acetone or waterborne materials. This means that these agencies who are using ultraviolet systems for water disinfection to protect public health and the environment would either not be able to reliably provide regulatory required disinfection or not be able to comply with the district rule. Furthermore, to ensure a drought proof long term water supply for Southern California, several agencies are constructing water recycling facilities that must meet new stringent potable reuse treatment and disinfection requirements to protect public health. These facilities will rely on ultraviolet systems to meet these disinfection requirements. The proposed solvent limits in Table 2 of PAR 1171 may not provide sufficient quantities for effective cleaning of ultraviolet systems limiting much needed recycled water production and stranding expensive public assets.



Beyond water disinfection, Clean Water SoCal members operate and maintain critical infrastructure to provide safe and reliable water and wastewater services to the customers and communities we serve. Agencies utilize aerosol solvents to maintain equipment such as pumps, piping, and engines, at various facilities throughout their service areas. Clean Water SoCal members have voiced concerns about the significant reduction in the proposed rule for the aerosol solvent cleaner's usage limits (PAR Rule 1171 Table 2.) Our members remain concerned with the potential unintended consequences this reduction could have on the maintenance and repair activities of infrastructure and equipment at essential public services. Many maintenance activities at essential public services require the use of aerosols. Aerosols are commonly used because they are quick dry, leave no residue which is critical for proper gasket adhesion and replace effectiveness, and they can reach small inaccessible areas of mechanical components, such as engines and pumps. Non aerosols solvents are typically not conducive to these work environments and equipment types.

We appreciate the opportunity to provide comments on the proposed amended Rule 1171 and for your consideration of our comments.

Clean Water SoCal supports the SCAQMD mission to clean the air and protect the health of all residents in the South Coast Air District. We have a similar goal and obligation to the public and the environment. As such, we would welcome the opportunity to meet to discuss and develop a solution that meets the public's needs.

If there are any questions regarding these comments, please contact the Clean Water SoCal Air Quality Manager, David Rothbart directly at (714) 878-9655 [drothbart@cleanwatersocal.org](mailto:drothbart@cleanwatersocal.org) or contact me directly at (760) 415-4332 [sjepsen@cleanwatersocal.org](mailto:sjepsen@cleanwatersocal.org)

Sincerely,

Steve Jepsen

Executive Director – Clean Water SoCal

cc: Clean Water SoCal Air Quality Committee