



April 11, 2025

South Coast Air Quality Management Committee
Stationary Source Committee

RE: COMMENTS ON PAR 1171

Coalition Members



Associated General Contractors
America-San Diego Chapter, Inc.



Building Industry Association
of Southern California



California Construction Trucking
Association



Engineering
Contractors Association



United Contractors



SOUTHERN CALIFORNIA CONTRACTORS ASSOCIATION

Southern California
Contractors Association

Dear Chairman Larry McCallon and Members of the Committee:

The Construction Industry Air Quality Coalition (CIAQC) would like to express our serious reservations about the proposed amendments to rule 1171 – Solvent Cleaning Operations.

We wish that the staff had done outreach to our specific industry before the proposed amendments had reached this level of completion.

The use of effective solvents for cleaning parts and equipment used in the construction industry is an integral part of assuring that our equipment is fully operational and in full compliance with the many regulations that govern the use and operation of our unique, on-road, off-road and portable equipment fleets. Much of this equipment is maintained in the field, on a job site, and away from a better equipped maintenance facility where there may be more options for cleaning parts and tools.

Under the existing rule there are very limited aerosol options that can meet the current 25 g/l VOC emission limits. Further there is also an existing 160 oz/day aerosol limitation which has been challenging to meet when servicing multiple locations simultaneously.

Proposed Rule 1171 will be eliminating the aerosol spray solvent exemption. Currently, SCAQMD Rule 1171 requires the use of solvents for repair and maintenance with a very low VOC content to 25 g/l or less. Those solvent are not effective on the grease and grime

encountered on off-road mobile equipment. Those solvents are typically citrus-based, or something like Simple Green. The only thing that cuts the grease is petroleum-based solvents. Currently there is an exemption that allows for the use of aerosol solvent cleaner that meet the CARB 10% VOC limitation. The proposed Rule 1171 will eliminate the use of aerosol cleaners (or essentially limit the use to a nonsensical 160 ounces per month per permitted facility). Not all sites are permitted facilities, so this leaves an unlevel playing field.

We have identified several other specific concerns that we would like to address with the staff as soon as possible.

1. Cleaning Effectiveness: Removing proven solvents risks reducing cleaning performance—especially for grease, oil, and other contaminants—which can significantly impact equipment maintenance and lead to increased failures overall, particularly in emissions-related components.

2. Productivity & Cost Impact: Alternative methods often take longer and require more labor, increasing downtime and repair costs.

3. Compliance Burden: New requirements may force additional costly repairs to equipment, training, and documentation—disproportionately affecting smaller operations.

4. Field Service Limitations: Effective, portable solvents are essential for remote repairs. Restrictions could leave no viable options for field work.

5. Safety & Reliability Risks: Residual buildup from weaker cleaners can compromise equipment safety, performance, and reliability.

6. Insufficient Alternatives & Timeline: Fast-tracking changes without viable substitutes in place risks non-compliance and operational disruption across the industry.

Our industry discussions with solvent suppliers lead us to believe that there may not be an effective compliant alternative available on the schedule established by this proposed amendment.

Finally, if an aerosol solvent is ultimately found that is effective and meets the 25 g/l low VOC requirement for general maintenance, does the 160 oz/day still apply? We would expect that there would be no limit, but this is not stated in the proposed regulation.

CIAQC has several experts available who can speak about these issues and we look forward to the opportunity to address them with your staff.

Sincerely,

A handwritten signature in black ink that reads "Michael W. Lewis". The signature is written in a cursive, flowing style.

Michael Lewis
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