

**Marissa Poon**

---

**From:** Jorge Roman <jroman@bmalaw.net>  
**Sent:** Thursday, May 22, 2025 8:05 AM  
**To:** Heather Farr; Michael Krause; Christopher Bradley; Sarady Ka; Michael Morris  
**Cc:** halfano@ilma.org; Jeffrey Leiter  
**Subject:** [EXTERNAL] ILMA Follow-Up on Proposed Amended Rule 1171

Dear SCAQMD Team,

The Independent Lubricant Manufacturers Association (ILMA) appreciated the opportunity to meet with you and discuss our concerns regarding Proposed Amended Rule 1171. We value the agency's engagement on this matter and recognize the challenge of balancing environmental, health, and economic considerations.

Please find below our follow-up observations:

#### **Phase-Out Period Ending July 1, 2028**

Extending the phase-out period for pCBtF and t-BAC will facilitate a smoother transition to water-based formulations and help avoid the risks associated with adopting highly flammable solvents. Accordingly, ILMA supports the proposed extension of the use-through period until *July 1, 2028*, which will provide end-users with essential flexibility. In alignment with this extension, we respectfully request that the sell-through period be extended until *July 1, 2027*. Importantly, this request does not alter the overall timeline of the phase-out; rather, it would support suppliers in transitioning to alternatives and managing existing inventories more effectively.

Additionally, we respectfully request that the final rule include a case-by-case mechanism allowing for a one-time extension upon demonstration that a certification process is underway for a compliant water-based alternative but has not yet been completed.

#### **Testing Method – ASTM E1868**

We commend the agency for incorporating ASTM E1868 as an alternative compliance method.

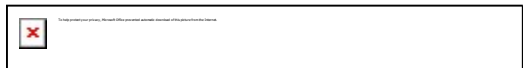
#### **Scope – 1144 Exemption**

Consistent with the agency's policy, the structure of the rule, and to promote clarity regarding its scope, ILMA urges the agency to clarify that solvent cleaning activities subject to Rule 1144 (METALWORKING FLUIDS AND DIRECT-CONTACT LUBRICANTS) are exempt from the solvents rule.

With these modest revisions, ILMA would be pleased to fully support the rule. We look forward to continued engagement and to hearing from you.

Sincerely,

Jorge Roman  
Regulatory Counsel  
ILMA



**Jorge Roman**

Associate Attorney

1707 L Street NW, Ste. 560

Washington, DC 20036

WP: (202) 466-6502

CP: (918) 409-5829