

Southern California Edison COMMENTS and Request for Clarification

Proposed Amended Rule 1171. Solvent Cleaning Operations

April 8, 2025

Southern California Edison (SCE) appreciates the opportunity to present comments and requests for clarification for Proposed Amended Rule 1171, *Solvent Cleaning Operations*, to the South Coast Air Quality Management District. Below is a summary of our comments and requested revisions.

Requirements

1. Table 2 – Alternative Usage and MIR Limits. There seems to be a disconnect between the discussion in the staff report regarding the use of denatured alcohol (DA) and the MIR limit included in Table 2 for Electricity Generating or Distribution Equipment. The staff report acknowledges the need to use DA to clean components. However, Table 2 PW-MIR limit of 0.61 appears to align with current alcohol-based products. SCE must use straight DA at our facilities. Studies have shown various product combinations are not as effective as DA alone. As of now, Mitsubishi Electric Power Products (MEPPI) has not yet completed the testing of IPA but has already stated that IPA is not an acceptable alternative for some components that make up a significant part of SCE's inventory. SCE will switch to IPA where MEPPI supports its use. However, until then, we will need to use straight DA on many of our components. As such, a PW-MIR limit of 0.61 for Electricity Generating or Distribution Equipment is not a feasible limit for SCE. We request this limit be revised to 1.7 to allow us to continue our cleaning operations until a lower MIR product is approved.
2. Alternative Limits for Aerosol Cleaning. Thank you for increasing the Aerosol Solvent Cleaner Usage Limit for "All Others Solvent Cleaning Activities" to 160 ounces per month. Based on our current operations and input from our field personnel, SCE respectfully requests that this limit be further increased to 640 ounces per month or 160 ounces per week. A higher monthly limit would be preferable as it would provide the flexibility we need for our operations and lessen the recordkeeping requirements.
3. It is our understanding that we can use both alternative compliance options (liquid and aerosol) at the same facility (a substation) for a combined use of 160 (640) ounces/month of aerosol and 70 gallons/yr of liquid. Please confirm. Different components need wipe cleaning using liquid solvents and other components need the aerosol pressurized stream. SCE needs the flexibility to use both alternative compliance options at the same facility.

4. Please confirm that hand-held spray bottles that use atomized air (see example) do not meet the definition of Aerosol in the rule (Rule 117 (c)(1)) and the material used via this mechanism falls under the 70 gallons per year limit per facility. Our interpretation is consistent with the federal and state definitions of “Aerosol product”, both of which exclude pump sprays (40 CFR § 59.202 – Definitions and CCR Title 17, 94508(a)(5)). Please clarify this distinction in the rule definition of “Aerosol Product”.



Recordkeeping

1. Section (g)(2)(c) requires dates and quantities of use. This requirement is extremely challenging for our unmanned locations, the vast number of locations we services, and the nature of our field work. Since the rule’s solvent usage limits are either monthly or annual, recording the daily usage of material seems unnecessary. We request that the rule allow for monthly recordkeeping and alternative recordkeeping approaches such as a central record keeping log where operators can input their solvent usage on a monthly basis by location, or use of purchase records without having to log daily usage at each location.

Thank you again for the opportunity to provide these comments. My contact information is below.

Carol Cauthen

Environmental Advisor, Air Quality

Environmental, Health, Safety & Quality| Environmental Department

T. 626-302-5073 | M. 626-407-1360

2244 Walnut Grove Ave, Rosemead, CA 91770