



March 27, 2025

Mr. Christopher Bradley
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

RE: South Coast Air Quality Management District Proposed Amended Rule 1171 – Cleaning Operations

Dear Mr. Bradley:

The W.M. Barr & Company, Inc. appreciates the opportunity to comment on the South Coast Air Quality Management District (SCAQMD) proposed amendments to Rule 1171 Cleaning Coating Operations. The W.M. Barr & Company, Inc. is a major supplier of Multi-purpose Solvents and Paint Thinners to the retail market under our Klean-Strip® brand. Our family of brands supports consumers in their efforts to maintain clean and well-maintained homes.

W. M. Barr has worked with SCAQMD in the past to provide comments and demonstrations that have assisted in developing rule which are better for the environment and for Industry.

Our comments are mainly focused in two sections of the regulations. These two sections are the (d) (3) Alternative limits for Aerosol Cleaners and (f) (3) General Prohibitions that deal with metholated siloxanes (VMS).

Aerosol Products

The SCAQMD Rule has a long history with regulating Aerosol Products. Consumer Products, including Aerosol Products were first regulated in the early nineties by the California Air Resources (CARB). At that time some limits were significantly higher, especially on Carb and Choke products and Brake Cleaners. Since that time CARB has re-regulated numerous categories and the VOC limits have been reduced significantly. Today the limits have been reduced to the lowest point that is technologically feasible per the State law that governs the CARB regulation.

Thus, there is little need for SCAQMD to continue to regulate the Aerosol products. W.M. Barr is proposing the SCAQMD simply propose to amend Rule 1171 to state that any cleaning product used under Rule 1171 needs to comply with CARB. This will regulate any products that are used in a manufacturing setting which is currently the only sector not currently subject to the CARB regulations all other uses are currently regulated and enforced by CARB.

W.M. Barr & Company, Inc.

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If SCAQMD does not agree to simply regulate Aerosol Cleaners in this manner, then additional changes need to be made to section (d) (3). The current list of Solvent Cleaning Activities is grossly understated in Table 3. The activities listed in Table 3 ignore numerous uses of cleaning products such as General-Purpose Cleaners, General Purpose Degreaser, Glass Cleaners and other types of surface cleaners routinely used in manufacturing and maintenance of products and components. Replacing 160 ounces per day with 160 ounce per month is not feasible. We would request at least 160 ounces per week or 640 ounces per month to cover other solvent cleaning activities that SCAQMD has not specifically detailed.

VMS

Volatile Methylated Siloxanes (VMS) particularly Octamethyl Cyclotetrasiloxane CAS #556-67-2 (04) is used for a wide variety of consumer and industrial applications. SCAQMD has proposed to virtually ban the use of this compound in the amendments. This compound has been used to replace the use of PCBTF in specialty cleaners which SCAQMD has also proposed to ban in this amendment. In fact, D4 is the only known viable replacement for PCBTF in specific solvent-based cleaning applications other than VOC organic solvents. SCAQMD has stated that numerous other alternatives are available to replace VMS or PCBTF. W.M. Barr would like to request a list of these other alternatives to be used. Our searches have not yielded any replacements for these compounds in cleaning applications for plastic automotive body surfaces.

SCAQMD should revisit the proposal of the ban on D4. The VMS ban is under subsection (f) (3) (B) Carcinogenic Materials and Exempt Compounds. While D4 is exempt it is not carcinogenic. In fact, this compound has not even been listed on the Proposition 65 list by the Office of Environmental Health Hazard Assessment (OEHAA). Thus, we do not understand the reason to ban this important chemical. W.M. Barr has prepared the attached summary on D4 to explain how toxicity of this compound does not support the need for a ban on use of the compound. Specifically, D4 is a critical tool to provide crucial cleaning efficacy needed in solvent cleaning operation. In addition to the summary paper, attached is the full draft risk evaluation on the toxicity of D4 and a representative supplier material Safety Data Sheet. W.M. Barr respectfully request SCAQMD reconsider a ban on D4.

Summary

W.M. Barr & Company again appreciates the opportunity to comment on the amendments to Rule 1171.

In summary, SCAQMD should consider using the CARB regulation for regulating Cleaning Products. If not SCAQMD needs to allow for the use of other solvent cleaning applications



that to date SCAQMD has not considered, such as cleaning of surface areas in manufacturing or just general cleaning.

Next, SCAQMD should remove the ban on VMS particularly D4. After SCAQMD reviews the attached data of the toxicity of D4, the ban should be removed.

W. M. Barr respectfully requests the above issues be reviewed; in addition, W.M. Barr would like to meet with SCAQMD staff to discuss these important amendments in Rule 1171 in further detail.

Thank you for your consideration to these comments and we look forward to working with you on these amendments. Any questions or comments please contact our consultant Doug Raymond at djraymond@me.com or at 440-339-4539.

Sincerely,

Amanda Burwell

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cc: Heather Farr
cc. Michael Morris
cc: Doug Raymond