



Our Valued Customer:

As you are aware, the South Coast AQMD has had a rule in place (Rule 1171) since 2000 that regulates the use of petroleum-based solvents in cleaning applications due to their VOC (volatile organic compound) content. The use of these restricted solvents in the South Coast AQMD can only be done if your cleaning processes meet the criteria under one or more of the approved exemptions outlined by the AQMD in Rule 1171 (attached for your convenience).

Rule 1171 was enacted by the South Coast AQMD in order to fight smog within the air basin that we live in. One of the principle components of smog is ozone. Ozone is not usually emitted directly into the air. Instead, it is created at ground-level by a chemical reaction between oxides of nitrogen (NOx) and VOCs in the presence of sunlight. Ozone has the same chemical structure whether it occurs miles above the earth (which helps shield us from UV radiation) or at ground-level and can be "good" or "bad" depending on its location in the atmosphere. Ozone is a strong oxidizing agent. When this ground-level ozone comes into contact with the respiratory tract, it can react with tissues and cause damage in the airways. Since it is a gas, it can penetrate into the gas exchange region of the deep lung. For these reasons, the South Coast AQMD enacted Rule 1171 to reduce smog and to protect our health.

Safety-Kleen is committed to helping our customers stay in compliance with the environmental regulations applicable to our products. We take pride in offering world class cleaning solutions that allow your business to operate in compliance with these regulations. We encourage you to review our complete line of service offerings for a solution that fits your business needs.

Safety-Kleen's AQMD Compliant Aqueous Parts Cleaning

Safety-Kleen's partnership with Arm & Hammer has resulted in a line of ArmaKleen aqueous chemistries that set the standard in our industry for water-based parts cleaning.

From manual sink-on-a-drum parts washers to automated spray cabinets to custom three stage pass-throughs, we offer the best value and performance in the business.

In 2007, Safety-Kleen released the patented Thermawave 507. This is the most reliable manual aqueous pump in the industry and can help you meet the strict requirements of Rule 1171.

Aqueous not only cleans as well as solvent, but provides several additional benefits: It is safe for your workers, safe for the environment; potentially reduces your hazardous waste generation; and can be used in an automated application, saving you time and money.



Safety-Kleen Compliance Bulletin



Safety-Kleen's AQMD Compliant Solvent

We have two different types of solvent that meet the VOC requirements set forth by the AQMD due to the fact that they are silicone based, and not petroleum based (QSOL 220 and QSOL 300). This solvent can be used in any of our standard parts washers.

Please review Rule 1171 and the identified exemptions that we have attached for your convenience. A Safety-Kleen representative will be contacting you to discuss this issue, and to show you our complete line of compliant aqueous cleaning solutions for your business.

The complete Rule 1171 can be found at: www.aqmd.gov/rules/reg/reg11/r1171.pdf.

If you have any questions or I can be of assistance, please feel free to contact me at the number below.

Best Regards,

<<Insert Branch General Manager's Name>>

Branch General Manager

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AQMD Exemptions (Rule 1171)

- 1) The provisions of this rule, except (c)(1), Solvent Requirements, shall not apply to cleaning operations using a solvent containing no more than 25 grams of VOC per liter of material, provided that, if the Executive Officer determines that a person has violated any provision of paragraph (c)(1), Solvent Requirements, then for a period of three years following such violation, paragraph (c)(6), Recordkeeping Requirements, shall apply to the facility at which the violation occurred.
- 2) The following solvent cleaning operations or activities are not subject to any provision of this rule:
 - a) Cleaning carried out in batch loaded cold cleaners, vapor degreasers, conveyORIZED degreasers, or motion picture film cleaning equipment.
 - b) Cleaning operations subject to Rule 1102 – Petroleum Solvent Dry Cleaners, and Rule 1421 – Control of Perchloroethylene Emissions from Dry Cleaning Operations.
 - c) Cleaning operations subject to Rule 1164 – Semiconductor Manufacturing
 - d) Cleaning operations subject to Rule 1124 – Aerospace Assembly and Component Manufacturing Operations, except coating application equipment cleaning, and storage and disposal of VOC containing materials used in solvent cleaning operations.
 - e) Cleaning operations subject to Rule 1141 – Control of Volatile Organic Compound Emissions from Resin Manufacturing, and Rule 1141.1 – Coatings and Ink Manufacturing.
 - f) Janitorial cleaning, including graffiti removal.
 - g) Stripping of cured coatings, cured ink, or cured adhesives.
- 3) Provisions of paragraph (c)(1) shall not apply to the following applications:
 - a) Cleaning of solar cells, laser hardware, scientific instruments, and high-precision optics.
 - b) Cleaning conducted with: performance laboratory tests on coatings, adhesives, or inks; research and development programs; and laboratory tests in quality assurance laboratories.
 - c) Cleaning of motor vehicles on application lines subject to Rule 1115 - Motor Vehicle Assembly Line Coating Operations.
 - d) Cleaning of paper-based gaskets, and clutch assemblies where rubber is bonded to metal by means of an adhesive.
 - e) Cleaning of cotton swabs to remove cottonseed oil before cleaning of high-precision optics.
 - f) Medical device and pharmaceutical facilities using up to 1.5 gallons per day of solvents.
 - g) Until December 31, 2008, the cleaning of photocurable resins from stereolithography equipment and models.
 - h) Until December 31, 2007, the cleaning of ultraviolet or electron beam lamps and reflectors used for the curing of ultraviolet or electron beam ink or coatings.
 - i) Cleaning of adhesive application equipment used for thin metal laminating operations provided the clean-up solvent used contains no more than 950 grams of VOC per liter.
 - j) Cleaning of electronic or electrical cables provided the clean-up solvent used contains no more than 400 grams of VOC per liter.
 - k) Touch up cleaning performed on printed circuit boards where surface mounted devices have already been attached provided that the solvent used contains no more than 800 grams of VOC per liter.



AQMD Exemptions (Rule 1171) - Continued

(4) Cleaning with aerosol products shall not be subject to the provisions of paragraph (c)(1) and paragraph (e)(1) if 160 fluid ounces or less of noncompliant aerosol products are used per day, per facility. The use of such product shall comply with CARB regulations.

(5) The provisions of subparagraph (c)(1)(C) shall not apply to the following applications:

- a) Cleaning of coating and adhesive application processes utilized to manufacture transdermal drug delivery product using less than 3 gallons per day of ethyl acetate averaged over a 30 calendar day period.
- b) Cleaning of application equipment used to apply coatings on satellites and radiation effect coatings.
- c) The cleaning of application equipment used to apply solvent-borne fluoropolymer coatings until December 31, 2008, provided the clean-up solvent used for such cleaning contains no more than 900 grams of VOC per liter.
- d) The cleaning of ultraviolet or electron beam adhesive application equipment until June 30, 2006, provided the clean-up solvent used for such cleaning contains no more than 500 grams of VOC per liter. Effective July 1, 2006, the VOC limit of 25 grams per liter specified in (c)(1)(C) shall apply for such cleaning.

(6) The provisions of subparagraph (c)(1)(D) shall not apply to persons or facilities using less than 1.5 gallons per day of solvents to clean sterilization indicating ink application equipment.

(7) Until December 31, 2007, the provisions of subparagraph (c)(1)(D) shall not apply to the cleaning of metering rollers, dampening rollers and printing plates, provided the clean-up solvent used for such cleaning contains no more than 800 grams of VOC per liter.

(8) Until December 31, 2007, the provisions of (c)(1)(D)(iv)(A)(II) shall not apply to automatic roller and blanket cleaning systems, provided the solvent used for such cleaning contains no more than 650 grams of VOC per liter.

(9) Provisions of paragraph (e)(1) shall not apply to the following:

- a) Cleaning of the nozzle tips of automated spray equipment systems, except for robotic systems.
- b) Cleaning with spray bottles or containers described in subparagraph (c)(2)(B).
- c) Printing operations where the roller or blanket wash is applied automatically.

(10) The provisions of this rule shall not apply to cleaning operations in printing pre-press or graphic arts pre-press areas, including the cleaning of film processors, color scanners, plate processors, film cleaning, and plate cleaning.