



May 7, 2021

COMPLIANCE ADVISORY
RULE 67.6.1 – COLD SOLVENT CLEANING AND STRIPPING OPERATIONS
RULE 67.6.2 – VAPOR DEGREASING OPERATIONS
EFFECTIVE FEBRUARY 10, 2021

On February 10, 2021, the San Diego County Air Pollution Control District (District) amended Rule 67.6.1 – Cold Solvent Cleaning and Stripping Operations, and Rule 67.6.2 – Vapor Degreasing Operations. Both rules became effective on February 10, 2021. Rule 67.6.1 and Rule 67.6.2 apply specifically to solvent cleaning equipment categorized as cold cleaners, paint strippers or vapor degreasers. They are commonly used at various facilities such as automotive repair, military installations, and electronics manufacturing to remove grease, oils, paints, and other substances from various items.

Pursuant to federal and State law, the District must update these rules as technologies to control vapor emissions advance and lower limits on the allowable emissions become feasible. The rule amendments are the result of these requirements and lowers the volatile organic compound (VOC) content limit contained in solvents, thereby reducing harmful emissions.

[Rule 67.6.1\(b\)\(1\)\(v\)](#) exempts cold solvent cleaning or stripping from Rule 67.6.1 standards for operations that exclusively use materials with a VOC content of 25 g/l of material or less, as used.

- Rule 67.6.1(b)(2) allows the use of materials with a VOC content **over** 25 g/L to clean electronic components, electrical components, medical devices, aerospace components, or precision optics components.
- Cold solvent cleaning operations **not** listed in the Rule 67.6.1(b)(2) exemption must be performed with materials with a VOC content of 25 g/L of material or less, as used.
- Failure to comply with these standards could result in a violation of Rule 67.6.1(d)(1).

[Rule 67.6.2\(b\)\(1\)\(i\)](#) exempts vapor degreasing operations that exclusively utilize materials with a VOC content of 25 g/l of material or less, as used, from Rule 67.6.2 standards.

District [Rule 11\(d\)\(16\)\(i\)](#) exempts cold solvent cleaning, stripping operations, and vapor degreasing operations exclusively using materials with a VOC content of 25 grams per liter (g/l) of material or less, as used, from requirements to obtain District permits to operate. Attached to this advisory is an updated list of solvents (Table AA-1) that have been evaluated by the District to meet this requirement.

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- If you use equipment that meets the above Rule 11 exemption, you have the option to retire your permit(s).
- Permits can be retired by contacting the District at apcdpermits@sdcounty.ca.gov or (858) 586-2600.
- Cold solvent cleaning operations that previously utilized the solvent “Oil Eater”, manufactured by Kafko International, must cease use of this solvent unless exclusively cleaning electronic components, electrical components, medical devices, aerospace components, or precision optics components in accordance with Rule 67.6.1

It shall be the responsibility of any person conducting such operations to keep a current list of all cleaning materials and the VOC content of each material, as used, to substantiate the exemptions in Rule 67.6.1(b)(1)(v) and Rule 67.6.2(b)(1)(i).

If you have questions about the compliance status of your equipment, please contact apcdcomp@sdcounty.ca.gov or (858) 586-2650.

WJ:jlmm

Attachment

ATTACHMENT AA: List of Solvents for Cold Solvent Cleaning Operations

The following solvents listed in Table AA-1 have been evaluated by the District and found to have a volatile organic compound (VOC) content of 25 g/L of material or less. Any operations that exclusively use solvents on this list are exempt from the requirement to obtain a permit to operate and exempt from the requirements of District Rule 67.6.1. Records substantiating this must be maintained on site in accordance with Rules 11 and 67.6.1. Note that other solvents may be evaluated by the District at the manufacturers' or a facility's request.

Table AA-1: Solvents with VOC \leq 25 g/L

| Manufacturer | CAS # or product name |
|---|------------------------|
| Safety-Kleen QSOL300, ZEP X-5202, Blue Star Silicones Solvent, Momenive TSF405, Dow Corning Fluid 245 | 541-02-6 |
| Safety-Kleen QSOL220 | 98-56-6 |
| Momentive | SF1202 |
| Shin-Etsu Chemical | KF-994 |
| Methyl Soyate | 67784-80-9 |
| Pacific Coast Lacquer | Solvent 2040 |
| Acetone | 67-64-1 |
| Octamethylcyclotetrasiloxane | 556-67-2 |
| Octamethyltrisiloxane | 107-51-7 |
| United Laboratories Inc. | United 605 Smart Solve |
| Industrial and Operational Chemical Lab | NAVSOLVE |
| Ecolink, Inc. | Ecolink 250-SS |
| 3M | Novec 72FL |

The following solvents listed in Table AA-2, or any other solvent listed in the equipment description of a permit to operate, have been evaluated by the District and found acceptable for Cold Solvent Cleaning Operations use (including batch-loaded solvent cleaners and remote reservoir cleaners). **These solvents shall only be used to exclusively clean electronic components, electrical components, medical devices, aerospace components, or precision optics components in accordance with District Rule 67.6.1.** Note that other solvents may be evaluated by the District at the manufacturer's or a facility's request.

Table AA-2: Solvents only approved for use under Rule 67.6.1(b)(2)

| Manufacturer/Product Names | CAS # or Product Name |
|--|--|
| Stoddard solvent, PD-680, Odorless mineral spirits | 8052-41-3 |
| PD-680 may also be listed as: | 64741-96-4 64742-88-7 64742-48-9 |
| Safety Kleen Gold (SK 150) and ZEP Dyna 170 | 64742-47-8 |
| Acetonitrile | 75-05-8 |
| Butanol | 71-36-3 |
| D-Limonene | 5989-27-5 |
| VV-L-800 | N/A |
| Envirosolv 654CR | N/A |
| Kafko International Ltd. | Oil Eater |
| Light Aliphatic Solvent Naphtha (Petroleum) | 64742-89-8 |
| Microcare BGA Aqueous Stencil Cleaner | Mixture |