

#### VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT

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#### **RULE 74.6, SURFACE CLEANING AND DEGREASING**

Please review APCD Rule 74.6, Surface Cleaning and Degreasing. The most recent version of Rule 74.6, adopted November 10, 2020 and effective January 1, 2022 requires that most solvents used for cleaning have an ROC content of less than 25 grams per liter. Note that the use of a "Clean Air Solvent" certified by the South Coast AQMD will comply with Rule 74.6. In fact, the use of a Clean Air Solvent is exempt from Rule 74.6 and exempt from permit requirements. Rule 74.6 does have some other exemptions from the ROC content requirements detailed below. The information on this form will help us to determine if the cleaning operations at your facility are exempt from permit requirements and Rule 74.6, and if not exempt, will help us to properly reflect the cleaning operation in your permit. Note that the ROC content limits of Rule 74.6 do not apply to solvent cleaning operations, such as substrate surface preparation and cleanup, that are regulated by other District rules. A list of these rules is contained in Rule 74.6.E.

Solvent Use Information		
Do you use any ROC-containing materials for cleanup, including cleanup of application equipment?	Yes 🗖	No 🗖
Cleanup is defined as the removal of <b>uncured</b> coating, adhesive, ink, or resin from any surface, including application equipment, oversprayed surfaces, and hands. Application equipment is used to apply coatings, inks, adhesives, or resins and includes but is not limited to, spray guns, rollers, brushes, and printing presses.		
Note that Rule 74.6.B.1 requires that ROC-containing materials used for cleanup, including cleaning of application equipment, have an ROC content no greater than 25 grams per liter.		
Do you use ROC-containing materials for cleaning electronic components, electrical apparatus, or aerospace components conducted inside a degreaser?	Yes 🗖	No 🗖
An electronic component is that portion of an assembly, including circuit card assemblies, printed wire assemblies, printed circuit boards, soldered joints, ground wires, bus bars, and other electrical fixtures, except for the actual cabinet in which the components are housed.		
Electrical apparatus components are components such as wires, windings, stators, rotors, magnets, contacts, relays, energizers, and connections in an apparatus that generates or transmits electrical energy including, but not limited to: alternators, generators, transformers, electric motors, cables, and circuit breakers, except for the actual cabinet in which the components are housed. Electrical components of graphic arts application equipment and hotline tools are also included in this category.		
An aerospace component is any raw material, partial or completed fabricated part, assembly of parts, or completed unit of any aircraft, helicopter, missile, or space vehicle, including mockups and prototypes.		
Note that Rule 74.6.B.1 requires that ROC-containing materials used for cleaning electronic components, electrical apparatus, or aerospace components conducted inside a degreaser have an ROC content no greater than 100 grams per liter.		
For purposes of this requirement, a degreaser is a cold cleaner which is defined as any batch operated equipment designed to contain liquid solvent that is operated below the solvent's boiling point to carry out solvent cleaning operations.		

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Do you use ROC-containing materials for cleaning of medical devices and pharmaceuticals, including repair and maintenance of tools, equipment and machinery?	Yes 🗖	No 🗖
A medical device is an instrument, apparatus, implement, machine, contrivance, implant, in vitro reagent or other similar article, including any component, raw material, or accessory, or any equipment primarily used to manufacture or repair such contrivance, that meets any one of the following conditions:		
<ul> <li>a. It is intended for use in the diagnosis of disease or other condition, or in the cure, mitigation, treatment, or prevention of disease.</li> <li>b. It is intended to affect the structure or any function of the body.</li> <li>c. It is defined in the National Formulary or the United States Pharmacopoeia, or any supplement to them.</li> </ul>		
Note that Rule 74.6.B.1 requires that ROC-containing materials used for cleaning of medical devices and pharmaceuticals, including repair and maintenance of tools, equipment and machinery have an ROC content no greater than 800 grams per liter.  Do you use ROC-containing materials for cleaning of medical devices and pharmaceuticals	Yes 🗖	No □
- general work surfaces cleaning?	105	110
See above for "medical device" definition.		
Note that Rule 74.6.B.1 requires that ROC-containing materials used for cleaning of medical devices and pharmaceuticals – general work surfaces cleaning - have an ROC content no greater than 600 grams per liter.		
Do you use any ROC-containing materials for solvent cleaning or other purposes in a manner not described above?	Yes 🗖	No 🗖
Solvent cleaning is the use of solvent to remove loosely held uncured adhesive, uncured ink, uncured coating, uncured resin, or other contaminants which include, but are not limited to, dirt, soil, lubricants, coolant, moisture, grease, and fingerprints from parts, products, tools, machinery, equipment, or general work areas.		
Note that Rule 74.6.B.1 requires that ROC-containing material used for solvent cleaning other than the four categories listed above have an ROC content no greater than 25 grams per liter. Some exemptions to this requirement are contained in Rule 74.6.E.		
If your answer is "yes", please explain these other uses in more detail.	-	

Rule 74.6 Exemption Information (These operations are exempt from the entire Rule)		
Do you use any ROC-containing materials for the stripping of cured coatings (e.g.; stripping), cured adhesives (e.g.; debonding, ungluing), cured ink, or cured resin?	Yes 🗆	No 🗖
Stripping is defined as the removal of cured coatings, cured inks, cured adhesives, and contaminants that are mechanically or chemically bonded to a surface.		
Do you use any ROC-containing materials in motion picture film cleaning equipment?	Yes 🗖	No 🗖
Rule 74.6.B.1 Exemption Information (These operations are only exempt from the solvent requirements of th	e Rule)	
Do you use any ROC-containing materials to clean ultraviolet lamps used to cure ultraviolet inks, coatings, adhesives, or resins?	Yes 🗆	No 🗖
Do you use any ROC-containing materials to clean solar cells, laser hardware, scientific instruments, or high-precision optics?	Yes 🗖	No 🗖
Do you use any ROC-containing materials for cleaning in laboratory tests and analyses, or bench scale or short term research and development programs?	Yes 🗖	No 🗖
Do you use any ROC-containing materials to remove elemental sodium from the inside of pipes and lines?	Yes 🗖	No 🗖
Do you use any ROC-containing materials to clean mold release compounds from molds?	Yes 🗆	No 🗖
Do you use any ROC-containing materials to clean tools used to cut or abrade cured magnetic oxide coatings?	Yes 🗖	No 🗖
Do you use any ROC-containing materials to clean aerospace assembly and subassembly surfaces that are exposed to strong oxidizers or reducers such as nitrogen tetroxide, liquid oxygen or hydrazine?	Yes 🗖	No 🗖
Do you use any ROC-containing materials to clean paper gaskets?	Yes 🗆	No 🗖
Do you use any ROC-containing materials to clean clutch assemblies where rubber is bonded to metal by means of an adhesive?	Yes 🗆	No 🗖
Do you use any ROC-containing materials to clean hydraulic fluid from filters and filter housings?	Yes 🗖	No 🗖
Do you use any ROC-containing materials to clean explosive materials and constituents from equipment associated with manufacturing, testing, or developing explosives?	Yes 🗖	No 🗖
Do you use any ROC-containing materials for aircraft engine gas path cleaning or stationary gas turbine gas path cleaning using solvent with an ROC content of 200 g/l or less as applied?	Yes 🗖	No 🗖

Permit Exemption Information

Do you perform any cleaning activities that involve the use of cleaning agents certified by the SCAQMD as Clean Air Solvents?	Yes 🗆	No 🗖
Rule 23.F.10.a exempts these cleaning agents from permit requirements.		
Do you perform any cleaning activities with non-refillable aerosol products?	Yes 🗖	No 🗖
Rule 23.F.6 exempts solvent cleaning activities using non-refillable aerosol cleaning products from permit requirements.		
Do you perform any janitorial cleaning, including graffiti removal?	Yes 🗆	No 🗖
Janitorial cleaning is defined as the cleaning of building or facility components, such as the floor, ceiling, walls, windows, doors, stairs, bathrooms, furnishings and the exterior surfaces of office equipment. Janitorial cleaning does not include the cleaning of process equipment such as piping, storage vessels and work benches.		
Rule 23.F.8 exempts janitorial services and use of products for routine janitorial maintenance, including graffiti removal, from permit requirements.		

#### CLEANING MATERIALS DATA SHEET

Complete one line for each cleaning solvent. Use additional sheets if necessary to report all products. Please complete this form for the materials that you currently use for your cleaning operations, as discussed in pages 1 through 3 of this form. For each cleaning material, identify the brand and product code, the type of cleaning being performed, and the ROC content. Refer to pages 1 and 2 of this form for a description of each usage type.

Usage Type Code	Manufacturer Name	Product Name or Code	ROC Content As Applied <sup>1</sup> (grams/liter) <sup>2</sup>	Proposed Maximum Annual Usage (Gal/Year)	Describe Rule 74.6  Exemption (if applicable)

- 1 ROC content is the same as VOC content.
- 2 To convert from "Pounds per Gallon" to "Grams per Liter, multiply by 120.

	Description
Code	
С	Cleanup
Е	Electronic or aerospace component conducted in a degreaser
M	Medical devices, including repair and maintenance
MG	Medical devices – general work surfaces cleaning
О	Other – Please Explain on a Separate Page

NOTE: Manufacturer's supporting VOC documentation that details the VOC content, as applied, in grams per liter or pounds per gallon must be submitted for each solvent.