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September 29, 2011

Mr. Alex Ryan-Bond
Environmental Associate
Ozone Transport Commission
444 N. Capitol Street, NW
Suite 638
Washington, DC 20001

Re: OTC Model Rule for Solvent Degreasing 2011

Dear Mr. Ryan-Bond,

On behalf of Keteca USA, Inc., I want to thank you for the great efforts taken by the OTC to ensure that this model rule will be both effective and implementable by listening to the comments and concerns of the shareholders.

Thank you for the opportunity to provide comments on the OTC Model Rule for Solvent Degreasing.

Comments:

Section 3.0 Standards

a. Batch-Loaded ConveyORIZED (In-Line) Cold Cleaners

We agree with the inclusion of remote reservoir cold cleaners

Remote reservoir cold cleaners commonly refer to a parts washer that is a sink type unit that sets on top of a drum. Many small automotive shops use this type of unit. Units are designed for both high VOC solvent use and aqueous based solvent use. Units designed for high VOC solvent can be easily converted to use aqueous based solvents at minimal cost. Even replacing a high VOC solvent unit with an aqueous based solvent unit requires minimal investment. Aqueous based solvents cost less per use gallon because they are sold in concentrated formula and diluted with water. Aqueous based solvents do not hold onto the dirt and oil that is removed resulting in a longer bath life than high VOC solvents and in turn making them more cost effective. ROI of a new aqueous based solvent unit is less than 9 months. Aqueous based solvents are non-combustible, non-toxic, biodegradable. This reduces the harmful exposure to the workers and their environment and may reduce general liability insurance costs for the shop owner.



The waste produced by cleaning parts must be disposed of properly whether using high VOC solvents or aqueous based solvents. There is no increase in contaminants when switching from high VOC solvents to aqueous based solvents. Both methods would remove the same contaminants in same applications resulting in the same disposal requirements.

There have been discussions about small use exemptions. We believe small use exemptions allow for loop holes for misuse of high VOC solvents. We believe any small use exemption should be specific to the DIY individual that is not engaged in a business where parts cleaning is an aspect of that business.

Thank you for this opportunity to comment.

Sincerely,

Kathy Parks
Vice President
Keteca USA, Inc.

Cc: Gene Pettingill