

**Comments of  
NORA, An Association of Responsible Recyclers ("NORA") on  
OTC Model Rule for Solvent Degreasing 2011**

NORA, An Association of Responsible Recyclers (formerly the National Oil Recyclers Association) is a national trade association, founded in 1984, whose members collect, recycle, and market used oil throughout the United States. NORA members produce on specification and off specification used oil fuel products and re-refine used oil to produce lubricants and feedstocks for lubricants. Several NORA members also collect and recycle degreasing fluids (aqueous and nonaqueous) as well as provide and repair degreasing equipment used by customers.

NORA supports the proposed model rule but offers the following recommendations.

Definition of Volatile Organic Compound

The draft model rule provided three options for the definition of Volatile Organic Compound ("VOC"). Option 1, developing a state specific definition, is not a good policy choice because model rules should be uniform from state-to-state. If each state adopts its own distinct definition of VOC the result will be confusion and frustration. Compliance would require state-by-state knowledge of the definition. Overall this will hinder implementation of the rule. The CARB definition was specifically designed to address the air quality issues in California and is not generally applicable to other regions of the country.

The federal list, set forth at 40 CFR 51.100(s), has received the greatest scrutiny through rule-making involving the regulated community throughout the entire United States and is generally accepted as workable and appropriate. NORA strongly recommends adoption of the federal list for the OTA model rule.

Compliance Date

The OTC Model rule would establish January 1, 2014 as the compliance date. A two-year time frame for compliance is not sufficient. The many components of this rule require education of the regulated community and extensive preparation. NORA recommends a compliance date of January 1, 2015 as much more realistic.

Respectfully submitted,

  
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Scott Parker, Executive Director

September 26, 2011