



# PRODUCTS CORPORATION

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September 24, 2013

Clerk of the Board  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95912

*via web portal - <http://www.arb.ca.gov/lispub/comm/bclist.php>*

RE: Proposed Amendments to the Aerosol Coating Products and the  
Consumer Products Regulations

Clerk of the Board:

Spray Products appreciates the opportunity to comment on proposed amendments to the Consumer Products Regulation and the Aerosol Coating Products Regulation. These proposed amendments are scheduled to be heard on September 26 by the California Air Resources Board (CARB).

Spray Products is a marketer and custom filler of many aerosol and liquid products sold to consumers and commercial operations. Spray Products has been in business for over eighty years. We employ 70 people at our manufacturing location in Pennsylvania and two people at our distribution warehouse located in Fresno, California. Spray Products has maintained a manufacturing and/or warehousing presence in California for over 30 years.

Spray Products has the following comments:

Spray Products is very concerned that the Aerosol Adhesive limits being proposed by the staff are not technologically and commercially feasible. Spray Products does not have a current path to meet these limits. We will research available technologies for formulations to meet these limits. Spray Products respectfully requests the staff to review the Aerosol Adhesive limits one year prior to the effective date to ensure that the technology exists to comply with these very stringent limits.

Spray Products does support the new definitions for single use cleaner and single use degreaser. These definitions provide clarity to the regulation that not all products are or General-purpose use. Spray Products develops products for both

single use purposes and general-purpose use. This addition will clarify issues with our customers.

Spray Products supports the exemption for chain driven vehicles added to the Gear, Chain and Wire lubricant definition. This exemption was needed for us to be able to continue to develop products that are effective.

Spray Products supports changes to Multi-purpose Lubricant & Dry Lubricant. The single use addition to the Multi-purpose lubricant definition is needed to clarify products designed for a single use that are not subject to the Multi-purpose lubricant standard. Likewise the Dry lubricant definition change clarifies that Dry lubricants are not subject to other lubricant category VOC limits.

Spray Products supports the extension of the Multi-purpose Lubricant VOC limit from 12/31/2015 to 12/31/2018. This change was needed to provide Industry more time to meet this very stringent limit.

Spray Products supports the additional definitions and changes to the definitions in the Aerosol Coating regulation. The General Coating limits will be extremely challenging to meet. We need as much time as possible to meet these limits. Spray Products requests that the 2010 table of MIR values be available for use as soon as possible. The board could instruct enforcement to use the 2010 table of MIR values as soon as the board adopts the new limits.

Spray Products supports the staffs' position to cap the Specialty Coatings categories VOC limits. This will allow manufactures to manufacture products and prevents any VOC increases.

Spray Products also supports the staffs' decision to pursue scientific studies on the Low Vapor Pressure (LVP) compounds. The LVP provision is vital to our formulations. We look forward to working with the staff on this issue.

In conclusion, Spray Products supports the amendments to the Consumer Products regulation and Aerosol Coating regulation. Thank you for your consideration to these comments. Any questions or comments feel free to contact our consultant Doug Raymond at 440-474-4999 or at [djraymond@reg-resources.com](mailto:djraymond@reg-resources.com).

Sincerely,

Bart Bastian, President

Cc: Carla Takemoto, Air Resources Board  
Doug Raymond, Raymond Regulatory Resources (3R), LLC