



April 18, 2014

California Air Resources Board  
1001 I Street  
Sacramento, California 95814  
<http://www.arb.ca.gov/lispub/comm/bclist.php>

Subject: 15-Day Notice of Modifications to the Original Proposed 2013 Amendments  
to the California Consumer Products Regulation

Dear Board Members,

The National Aerosol Association (NAA) appreciates the opportunity to comment on the California Air Resources Board's (ARB's) 15-day Notice of Public Availability of Modified Text for the September 2013 Public Hearing Amendments to the Consumer Product Regulation.

NAA has worked with ARB cooperatively to develop Consumer Product Regulation that is feasible and reduces ozone production. The NAA comments are directed at the definition section of the amendments. NAA agrees that the changes to the definitions clarify the intent of the regulation. The clarifications to the Single Purpose Cleaner definition and the Single Purpose Degreaser definition assist in clarifying that products in categories that are already regulated are not subject to this definition. NAA agrees with this position and NAA supports the inclusion of these definitions into the rule. The entire definition clarifies that there are numerous cleaners and degreasers used on objects that are not intended as general use products and thus should not be regulated under those categories.

NAA again appreciates the opportunity to comment on this document. NAA looks forward to continuing our working relationship with ARB's staff.

On Behalf of the National Aerosol Association,

A handwritten signature in black ink that reads "Douglas Raymond". The signature is written in a cursive style.

Douglas Raymond