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September 23, 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>

Subject: Proposed Amendments to the Consumer Products Regulations

Dear Clerk of the Board,

Ecolab appreciates the opportunity to comment on the amendments to the Consumer Products regulation. These amendments are to be heard by the California Air Resources Board on September 26, 2013.

A trusted partner at more than one million customer locations, Ecolab (ECL) is a global leader in water, hygiene and energy technologies and services that protect people and vital resources. With 41,000 associates, Ecolab delivers comprehensive solutions and on-site service to help ensure safe food, maintain clean environments, optimize water and energy use and improve operational efficiencies for customers in the food, healthcare, energy, hospitality and industrial markets in more than 170 countries around the world.

Ecolab has the following comments.

- Ecolab supports the addition of the definitions for Single Purpose Cleaner and Single Purpose Degreaser. Ecolab produces General Purpose products and Single purpose products. The addition of the definitions provides clarity to the regulation.
- Ecolab supports the scientific pathway being taken by the staff in dealing with the Low Vapor Pressure (LVP) provision. LVP compounds are extremely important in maintaining compliance with current and future VOC limits. The LVP provision is needed to provide technical feasibility to the current VOC limits.

In summary, Ecolab supports the amendments to the Consumer Product regulation.

Thank you for your consideration to these comments. Any questions or comments feel free to call our consultant Doug Raymond at 440-474-4999 or at [djraymond@reg-resources.com](mailto:djraymond@reg-resources.com).

Sincerely,

**Sara Seidl**

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