

June 23, 2008

via e-mail

Honorable Board Members
Air Resources Board
1001 I Street, 23rd Floor
Sacramento, California 95814
Attn: Ms. Lori Andreoni, Board Secretary
<http://www.arb.ca.gov/lispub/comm/bclist.php>

Subject: Proposed Amendments to the California Consumer Products Regulations; Board
Agenda Item # 08-6-5

Dear Honorable Board Members:

The Consumer Specialty Products Association (CSPA) appreciates the opportunity to submit comments on the Air Resources Board (ARB) Staff Proposal for Amendments to the California Consumer Products Regulations.¹ In summary, the ARB Staff proposal will establish new or more restrictive volatile organic compound (VOC) limits for 17 product categories. These limits are more restrictive than any similar federal or state regulatory standards. In addition, the ARB staff proposal also includes a restriction on the use of compounds with high global warming potential (GWP). There is no comparable federal or state regulation reducing greenhouse gas emissions. The ARB Staff's proposal represents a significant challenge to CSPA member companies, and to the consumers and businesses in California who rely on our products to help provide a clean and healthy environment in which to live and work.

CSPA participated as an active member of the ARB's Consumer Products Regulation Workgroup (CPRWG). We commend ARB Staff's efforts to ensure that all interested parties had an opportunity to participate in this open and transparent public effort to develop the proposed amendments presented to the Board for your consideration. Throughout the course of this rulemaking process, CSPA worked cooperatively with ARB staff, environmental groups, air districts and various other stakeholders to identify potential opportunities for further reductions in the VOC content of consumer products in the hope that these challenging new regulatory limits will prove to be technologically and commercially feasible. CSPA filed initial comments dated September 14, 2007, February 27, 2008, and March 27, 2008. We also submitted comments to ARB on November 30, 2007, regarding the potential exemption of a number of halogenated chemicals. These documents are incorporated herein by express reference.

CSPA member companies take seriously the environmental health and safety benefits of our products, and continuously seek to improve them. Therefore, CSPA member companies are willing to accept most of the ARB Staff's proposed amendments and will commit the resources necessary to reformulate products to meet the stringent new VOC limits. However, CSPA continues to express concern about the technological and commercial feasibility of the proposed

¹ The full text of the ARB Staff's proposed amendments to California's comprehensive Consumer Products Regulation and other related documents are posted at:
<http://www.arb.ca.gov/regact/2008/cp2008/cp2008.htm>

VOC limit for the Carpet/Upholstery Cleaner (Aerosol) Product Category. In addition, CSPA continues to believe that the ARB should provide additional time for manufacturers to reformulate Floor Maintenance Products and Windshield Water Repellent Products.

Specifically, CSPA believes that a 2012 effective date for the new VOC limits for these two product categories would provide a more reasonable and achievable schedule.

Furthermore, CSPA wants to ensure that the record of this rulemaking reflects the fact that we continue to have serious concerns that the proposed future second-tier technology-forcing VOC limit for the Multi-purpose Lubricant Product Category is premised upon ARB Staff's desire to encourage product manufacturers to explore emerging (but yet unknown) technologies. Since CSPA members have no present knowledge of such technology, we cannot support this proposed second-tier VOC limit. Yet, CSPA members are willing initiate a good-faith effort to work with ARB Staff and to commit the resources necessary to explore new technologies that may be capable of achieving this extremely challenging new VOC limit. Thus, CSPA does not oppose the Staff's proposed second-tier limit for this product category.

CSPA's general willingness to accept most of the ARB Staff's proposal is consistent with the Association's long-standing efforts to work constructively and cooperatively with ARB staff and other stakeholders. During the past 20 years, CSPA member companies spent hundreds of millions of dollars to lower VOC content in consumer products to help improve air quality in California while maintaining our industry's ability to supply effective products that consumers can rely upon to contribute positively to their health, safety, and quality of life.

Finally, ARB Staff asserts that the State Strategy for California's 2007 State Implementation Plan "acknowledges that VOC reductions from consumer products are becoming more difficult to achieve. In light of this, the Strategy includes a commitment to explore innovative reduction strategies in the longer term."² CSPA agrees with this assessment and strongly believes that future "command and control" regulation of consumer products does *not* provide a viable path forward towards achieving further improvements in air quality. CSPA's consensus position does not reflect any diminution in our industry's commitment to continue our efforts to improve the environmental attributes of our products. Rather, it is a pragmatic recognition that the serious challenge of improving California's air quality requires the application of new and innovative thinking. Accordingly, CSPA commits to continue to work cooperatively with ARB staff and other stakeholders to identify new approaches to continue ARB's successful efforts to protect and improve the health of all California residents.

STATEMENT OF INTEREST

CSPA is a voluntary, non-profit national trade association representing approximately 250 companies engaged in the manufacture, formulation, distribution, and sale of chemical specialties products for household, institutional, commercial and industrial use. CSPA member companies' wide range of products includes home, lawn and garden pesticides, antimicrobial products, air care products, automotive specialty products, detergents and cleaning products,

² "Initial Statement of Reasons for Proposed Amendments to the California Consumer Products Regulation," ARB (May 9, 2008) at ES-7.

polishes and floor maintenance products, and various types of aerosol products. These products are formulated and packaged in many forms and are generally marketed nationally.

COMMENTS

In comments CSPA submitted as part of the CPRWG's open and interactive process, we articulated our concerns about the challenges posed by the ARB Staff's proposed stringent new VOC limits and GHG restrictions for specific product categories. In addition, CSPA clearly expressed concerns about the ARB Staff's proposal to establish new (and revised) product category definitions and related enforcement provisions. Since the documents are expressly incorporated in these comments, we will not reiterate our particular concerns.

This document is intended to identify CSPA's specific recommendations for changes in the ARB Staff's proposed rule amendments. If these final changes in these few specific provisions of the Proposed Regulation Order are made prior to adoption at the June 26-27 Board hearing, we are willing to accept the challenge of determining whether these new requirements will be technologically and commercially feasible for our members and their products.

A. CSPA Urges the Board to Incorporate Changes in Specific Provisions of the ARB's Staff's Proposed Regulation Order.

The ARB Staff should be commended for their work on this major regulation. As a result of ARB Staff's open and transparent rulemaking process, the proposed challenging new VOC and GWP limits and related provisions will provide significant reductions in emissions. However, CSPA strongly believes that there are a few issues that need to be addressed prior to adoption of a final rule, and we have outlined these issues in these comments.

1. Global Warming Potential and GWP Value

CSPA supports the proposed definitions for "Global Warming Potential (GWP)" and "Global Warming Potential Value" (GWP Value) for the purpose of limiting the GWP of Pressurized Gas Dusters. The choice to define GWP Value through descriptive reference to some of the numbers contained in two tables in a massive United Nations report does, however, presents some practical difficulties for companies seeking to comply with the standard being set for these products. We therefore request that, if the specific chemicals and GWP Values cannot be expressly included in the regulation, ARB staff issue a compliance advisory that clearly provides the GWP Values of all of the compounds that must be used in complying with this rule.

In addition, we have concerns regarding some aspects of this definition that may make it not appropriate when and if other product categories are subjected to GWP limits. In particular, we are concerned about the requirement that the GWP value for all chemicals or compounds not assigned a specific value in the United Nations report is designated to be equal to the GWP limit for the applicable product category. While this may be a sound practical approach for the Pressurized Gas Duster category, it could be inappropriate for some future categories and formulations. We urge that options remain open to refine this definition in any future rulemaking seeking to establish further GWP limits for consumer products.

2. Motor Vehicle Wash

As currently drafted, the proposed definition for this product category would include wash and wax products, as well as products that are not diluted or rinsed off with water. It would therefore include all forms of spray and wipe products and would eliminate the aerosol form for motor vehicle cleaners. These products may not be common, but they can play an important role in water conservation by allowing automotive exteriors to be cleaned without the use of water. Therefore, CSPA recommends the following narrowly-tailored revision to the definition for this newly-regulated product category.

Italicized text = text added to the proposed regulation

~~Stricken text~~ = text deleted from the proposed regulation

(99) “Motor Vehicle Wash” means a product designed ~~or to dilute with water and~~ labeled to wash, wash and wax, wash and shine, or wash and/or clean the exterior surface of motor vehicles. “Motor Vehicle Wash” includes, but is not limited to, products for use in commercial, fleet, hand, and “drive through” car washes; commercial truck washing or large vehicle washing stations; vehicle dealers and repair shops as well as products intended for household consumer use. “Motor Vehicle Wash” does not include “Bug and Tar Remover,” “Glass Cleaner,” “Tire or Wheel Cleaner,” and products labeled for use exclusively on locomotives or aircraft.

In addition, CSPA continues to urge that this definition be restricted to avoid this very stringent new VOC limit being applied to products and forms for which it is not feasible.

3. “Not for Retail Sale”

Based upon our discussions with the ARB Staff, we understand that the intent of this new definition is to clarify (but not change) the use of this term in the definitions for two product categories, “General Purpose Degreasers” and “Multi-Purpose Lubricants.” In both of these definitions, being labeled “Not for Retail Sale” is part of a two-pronged standard defining those products excluded from the definitions, and therefore not subject to the applicable VOC limits. The other part of that two-part standard requires that the products are “sold exclusively to establishments which manufacture or construct goods or commodities.” CSPA supports clarification in this critical area, since it is very important for our industry as well as ARB to clearly distinguish between what products are consumer products subject to these VOC limits and what products are manufacturing-use-only products that are outside of the scope of this regulation.

Unfortunately, the language proposed by the ARB Staff serves to further confuse rather than clarify. Read rigorously, to be “Not for Retail Sale” products excluded from the state regulations, the product would not only have to be used solely by manufacturers, but also be sold directly to manufacturers or holders of “commercial licenses,” with no definition given for that latter term. The only example given for “commercial licenses” is “electrician.” It is very

likely, however, based on our past discussions, that ARB staff is seeking to clarify their intent that products sold in stores open to the public (*e.g.*, open to ARB Enforcement staff) are consumer products subject to these limits.

In addition, the proposed definition would define “Not for Retail Sale” to exclude products “sold in retail outlets or wholesale locations where household consumers may purchase products.” A strict interpretation of this definition would therefore prevent manufacturer-use-only products being sold by these distributors even if those facilities are able to restrict these products to be sold to manufacturer customers only. This would appear to be overly restrictive, and present an undue burden on small manufacturers that buy these products in products in small quantities at these types of locations. We believe that ARB should allow any and all distribution systems that can assure that manufacturer-use-only products are sold only to manufacturers.

After further consideration, CSPA believes that defining the term “Not for Retail Sale” may not be a suitable manner to clarify the scope of coverage for these two product categories. The label term “Not for Retail Sale” is used very widely in our industry to comply with federal regulations that require product labels to signify whether a product is a consumer product under jurisdiction of the U.S. Consumer Product Safety Commission (CPSC) regulations, or a product used exclusively in workplaces and therefore subject only to Occupational Safety and Health Administration (OSHA) regulations. In this usage, “Not for Retail Sale” has a very different, much broader meaning than that proposed for use by ARB. These products are sold to institutional and commercial consumers as well as manufacturers. The majority of products that are labeled “Not for Retail Sale” are therefore regulated by ARB as consumer products. Any more restrictive ARB definition of this term would simply result in most of the products (including many lubricants and degreasers) labeled “Not for Retail Sale” being inconsistent with the ARB definition.

CSPA believes that the best way to remove any potential ambiguity as to whether the ARB’s regulatory provisions apply to specific products would be to clarify the definitions for these product categories. We believe that the following two definitions would result in clear demarcations for the products currently considered by ARB to be subject to the applicable VOC limits.

Italicized text = text added to the current regulatory definition

(68) “General Purpose Degreaser” means any product labeled to remove or dissolve grease, grime, oil and other oil-based contaminants from a variety of substrates, including automotive or miscellaneous metallic parts. “General Purpose Degreaser” does not include “Engine Degreaser,” “General Purpose Cleaner,” “Adhesive Remover,” “Electronic Cleaner,” “Electrical Cleaner,” “Energized Electrical Cleaner,” “Metal Polish/Cleanser,” products used exclusively in “solvent cleaning tanks or related equipment,” *or products that are sold exclusively (directly and/or by distributors) for use in establishments which manufacture or construct goods or commodities; and labeled for manufacturer use only.* “Solvent cleaning tanks or related equipment” includes, but is not limited

to, cold cleaners, vapor degreasers, conveyorized degreasers, film cleaning machines, or products designed to clean miscellaneous metallic parts by immersion in a container. **“General Purpose Degreaser” includes products sold in retail outlets or wholesale locations to non-manufacturing consumers.**

(89) “Lubricant” means a product designed to reduce friction, heat, noise, or wear between moving parts, or to loosen rusted or immovable parts or mechanisms. “Lubricant” does not include automotive power steering fluids; products for use inside power generating motors, engines, and turbines, and their associated power-transfer gearboxes; two cycle oils or other products designed to be added to fuels; products for use on the human body or animals or **products that are sold exclusively (directly and/or by distributors) for use in establishments which manufacture or construct goods or commodities, and labeled for manufacturer use only.** **“Lubricant” includes products sold in retail outlets or wholesale locations to non-manufacturing consumers.**

These changes would provide a very clear demarcation between what products are subject to this Consumer Product Regulation and we urge ARB to adopt this approach to making this important clarification.

In addition, we believe that ARB should consider making this clarification as it applies to the other product categories that may include some manufacturer-use-only products outside of the scope of “Consumer Products” as it is defined in this regulation to include “Institutional Products” or “Institutional and Industrial Products.” This could be accomplished by revising the definition for Institutional Products to read as follows:

“Institutional Product” or “Industrial and Institutional (I&I) Product” means a consumer product that is designed for use in the maintenance or operation of an establishment that: (A) manufactures, transports, or sells goods or commodities, or provides services for profit; or (B) is engaged in the nonprofit promotion of a particular public, educational, or charitable cause. “Establishments” include, but are not limited to, government agencies, factories, schools, hospitals, sanitariums, prisons, restaurants, hotels, stores, automobile service and parts centers, health clubs, theaters, or transportation companies. “Institutional Product” does not include household products and **products that are sold exclusively (directly and/or by distributors) for use in establishments which manufacture or construct goods or commodities, and labeled for manufacturer use only.** **“Institutional Product” includes products sold in retail outlets or wholesale locations to non-manufacturing consumers.**

In conclusion, CSPA believes that these narrowly-tailored revisions will eliminate any potential ambiguity as to the applicability of the ARB’s regulatory standards. Moreover, the revisions will promote efforts by the ARB Staff to restrict the sale of unregulated products to consumers.

4. Floor Maintenance Product

While CSPA generally supports the ARB Staff's proposed definition for this newly regulated product category, some members expressed concern about potential ambiguity as to whether the new VOC limit may also be applied to products that are currently subject to the architectural coatings regulations. Accordingly, CSPA urges ARB to incorporate the following narrowly-tailed revision to the proposed definition.

Floor Maintenance Product means any product designed or labeled to restore, maintain, or enhance a previously applied floor finish. "Floor Maintenance Product" includes, but is not limited to, products that are labeled as Spray Buff products or Floor Maintainers or Restorers. "Floor Maintenance Product" does not include floor polish products, products designed solely for the purpose of cleaning, or products designed specifically for use on marble floors, *or coatings subject to architectural coatings regulations*.

This revision will make the definition for the newly-regulated Maintenance Products consistent with the definition for the "Floor Polish or Wax" Product Category.

5. Odor Remover/ Eliminator

CSPA worked cooperatively with ARB staff to assure that this new category definition and VOC limit do not re-regulate currently regulated products, either directly or through Most Restrictive Limit provisions. We believe that the proposed definition accomplishes this goal, but plan to continue to carefully monitor its interpretation to assure that currently regulated products are not subject to the new categorical limits.

6. Pressurized Gas Duster

CSPA worked closely with ARB staff to develop the exclusion for non-flammable products to allow products that can safely be used where ignition sources may be present, and believe that the proposed definition accomplishes this goal.

7. Definition of the Term "Volatile Organic Compound"

CSPA fully supports the proposed addition of ethoxy-nonafluorobutane (HFE 7200) to the list of compounds excluded from the definition of "Volatile Organic Compound." This chemical is needed for use in some of the products currently subject to VOC limits. As we noted in our comments submitted on November 30, 2007, on the Draft ARB Staff Report on "Environmental Impact Assessment of Selected Halogenated Compounds," CSPA also believes that several other of the halogenated solvents that have petitioned for exemption as negligibly reactive should also be considered for exemption, and urges ARB to consider such exemptions in future rulemakings. We also continue to support the exemption of t-butyl acetate, a solvent that has likewise been clearly demonstrated to exhibit negligible photochemical reactivity, and could play a valuable role in VOC reductions for some consumer products.

B. CSPA Member Companies Express Their General Willingness to Accept the Challenge of Determining Whether the ARB Staff's Proposed New VOC Limits Are Technologically and Commercially Feasible.

CSPA member companies have committed to expending the considerable resources necessary to develop products that will comply with the ARB Staff's ambitious VOC limits and effective dates as set forth in the table.

Product Category	Product Form	Proposed VOC Limit (percent by weight)	Effective Date
Carpet/Upholstery Cleaner	Non-aerosol	1	December 31, 2010
Dusting Aid	Aerosol	17	December 31, 2010
	Non-aerosol	3	December 31, 2010
Fabric Protectant	Non-aerosol	1	December 31, 2010
Floor Polish or Wax – Wood Floor Wax	All	70	December 31, 2010
Glass Cleaner	Aerosol	10	December 31, 2012
Motor Vehicle Wash	All	0.2	December 31, 2010
Multi-purpose Lubricant – excluding solid & semisolid	All	25	December 31, 2013
		10	December 31, 2015
Odor Remover/Eliminator	Aerosol	25	December 31, 2010
	Non-aerosol	6	December 31, 2010
Penetrant	All	25	December 31, 2013
Pressurized Gas Duster	All	1	December 31, 2010
Spot Remover	Aerosol	15	December 31, 2010
	Non-aerosol	3	December 31, 2010
Tire or Wheel Cleaner	Aerosol	8	December 31, 2010
	Non-aerosol	2	December 31, 2010

CSPA member companies are willing to work toward the above-referenced standards and dates and ask that appropriate considerations be made if any of these VOC limits or effective dates proves to be infeasible for some companies and products. This commitment includes the 10% limit for Multi-Purpose Lubricant in 2015, for which no known or currently foreseeable technology exists (see further comments set forth at Section C of this document).

However, CSPA member companies continue to express some concern regarding one of the proposed limits and two other proposed effective dates. Specifically, we are concerned regarding the following:

Product Category	Product Form	Proposed VOC Limit (percent by weight)	Effective Date
Carpet/Upholstery Cleaner	Aerosol	5	December 31, 2010
Floor Maintenance Products	All	1	December 31, 2010
Windshield Water Repellent	All	75	December 31, 2010

While CSPA has agreed fully to meet the technical challenges necessary to comply with most of the stringent new VOC limits proposed by ARB Staff, we continue to express the concerns about one of these limits and two of these effective dates. Specifically, CSPA believes that a 6 percent VOC limit is more clearly technologically and commercially feasible for the Aerosol Carpet/Upholstery Cleaner Category than the 5 percent VOC limit proposed by the ARB Staff. In addition, CSPA believes that 2012 effective dates would provide a more reasonable and achievable schedule for Floor Maintenance Products and Windshield Water Repellent product categories.

Finally, as stated in our earlier comments, CSPA member companies do not object to the ARB Staff's proposal to restrict the use of methylene chloride, perchloroethylene, and trichloroethylene in specifically identified product categories.

C. CSPA Continues to Have Serious Concerns about the Proposed Second-tier Technology-forcing VOC limit for the Multi-Purpose Lubricant Category.

CSPA fully agrees with the ARB Staff admission that the proposed VOC limits for the Multi-Purpose Lubricant Product Category and the Penetrant Product Category are "challenging – especially for aerosols."³ CSPA strongly believes that the ARB Staff's two-tiers of VOC limits and effective dates for Multi-Purpose Lubricants pose a very significant technological challenge. CSPA member companies are committing to exert their best good-faith efforts to push the limits of current technologies in developing new product formulations in the hope of developing commercially viable products that will comply with the very challenging two-tiered VOC limits. To be clear, however, this commitment entails taking necessary risks with brand names that have been built over many years.

However, CSPA wants to ensure that the record for this rulemaking clearly reflects that we continue to have very significant concerns about the ARB Staff's proposal to establish a second-tier technology-forcing 10 percent VOC limit that will take effect on December 31, 2015. Since CSPA members are willing to undertake this challenge, we do not oppose the proposed second-tier VOC limit. Moreover, CSPA members commit to work closely and cooperatively with the

³ Initial Statement of Reasons for Proposed Amendments to the California Consumer Products Regulation," ARB (May 9, 2008) at VI-100.

ARB Staff in providing the detailed written updates on our research and development efforts as required by the proposed new subsection 94513(f).

Since there is no known (or reasonably foreseeable) technology that can be applied to achieve compliance with the second-tier VOC limit, we ask that ARB specifically commit to reconsider these limits expeditiously in the future if one or both prove to be infeasible. If our best efforts fail to develop effective and commercially viable multi-purpose lubricant products, it is essential that this issue be addressed before effective the commercial and industrial operations that rely on these products are impacted adversely.

D. CSPA Urges That Sell-Through for Pressurized Gas Dusters Be Extended to Three Years

For all VOC limits in this regulation, Section 94509(c) provides a three period for the sell-through of non-complying products manufactured prior to the effective date of any new or revised limit. This provision has proven effective in phasing out higher-VOC products from the marketplace while saving the massive costs (and adverse environmental impacts) that would be caused from manufacturer product recalls. We are very concerned, however, that proposed Section 94509(r)(2) provides only a one-year sell-through for Pressurized Gas Dusters in noncompliance with the new GWP Value limit.

While the vast majority of Pressurized Gas Dusters will sell through the distribution chain within the one year period, assuring that 100 percent of products are removed from sale could require recalls that are expensive, result in additional transportation of product that result in both ozone precursor and global warming gas emissions, and likely result in the product simply being transported for sale outside the state. We therefore urge ARB to consider providing a three year sell-through, or to exercise enforcement discretion to resolve this issue through other means.

E. CSPA Supports the Consensus Positions Articulated by Other National Trade Associations on Their Member Companies' Products.

As stated in comments we filed as part of the CPWRG process, CSPA supports the position articulated by the Soap and Detergents Association on the ARB Staff's proposed VOC limit for the Fabric Softener- Single Use Dryer Product Category.

CSPA also supports the positions being taken by the Personal Care Product Council (formerly the Cosmetic Toiletry and Fragrance Association) on the ARB Staff's proposed VOC limit for the following personal care product categories: (1) Astringent / Toner (non-FDA regulated) Products; and (2) Personal Fragrance Product (products with 20% or less fragrance).

Finally, CSPA supports the positions taken by the National Paint and Coatings Association and the Adhesives and Sealants Council on the ARB Staff's proposed VOC limit for the Sealant or Caulking Compound Product Category. In regards to the new limit and revised labeling requirements for Sealant and Caulking Compound, we recommend that ARB clarify that the new labeling requirements become effective on the same date as the new VOC limit.

SUMMARY AND CONCLUSIONS

During the nine months of this rulemaking process, CSPA worked closely and cooperatively with ARB Staff, environmental groups, air districts and various other stakeholders as part of the CPRWG. As a result of ARB Staff's open and transparent process, they developed and proposed challenging new VOC and GWP limits and related provisions that are likely to be technologically and commercially feasible. Furthermore, these new regulatory limits will provide significant emission reductions. The ARB Staff should be commended for their work on this major regulation.

However, as outlined in these comments, CSPA strongly believes that there are a few remaining issues that need to be addressed prior to adoption of a final rule. Therefore, CSPA respectfully urges the Board to incorporate the revisions recommended in these comments.

In conclusion, the new VOC limits and related provisions in the ARB Staff's proposal present a very serious and costly formulating and marketing challenge. CSPA hopes that all of these proposed VOC limits will prove feasible in the short time frames allowed for compliance. In at least a few instances, our members have yet to identify feasible product technologies to meet these new VOC standards. Therefore, CSPA request that ARB Staff commit to work with us to reevaluate these limits in the future if they prove to be technologically and commercially infeasible.

Once again, CSPA expresses our appreciation for the opportunity to comment on the ARB Staff's proposed amendments to California's very stringent and comprehensive Consumer Products Regulation. Please contact us any time if you have questions regarding any of the issues raised in these comments.

Respectfully submitted,



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