



Representing Household & Institutional Products

Aerosol - Air Care - Cleaners - Polishes  
Automotive Care - Antimicrobial - Pest Management

November 20, 2012

via electronic transmission

Clerk of the Board  
Air Resources Board  
1001 I Street, 23<sup>rd</sup> Floor  
Sacramento, California 95814  
<http://www.arb.ca.gov/lispub/comm/bclist.php>

Subject: 15-Day Notice of Modifications to California Regulation for Automotive Windshield Washer Fluid (AWWF) Products; Board Resolution 12-32<sup>1</sup>

Dear Board Members:

The Consumer Specialty Products Association (CSPA)<sup>2</sup> is on record supporting the amendments to California Regulation related to the AWWF product category<sup>3</sup> and appreciates the opportunity to offer comments on the modification set forth in Attachment B to Board Resolution 12-32.<sup>4</sup>

CSPA supports the inclusion of an additional ZIP code in San Bernardino County to the Type “A” area listed in Table 94508(a)(20)(B). As noted during the Board’s public hearing, this particular area of San Bernardino County experiences freezing temperatures during the winter months. Thus, the modification will further enhance public safety by eliminating potentially hazardous conditions that could occur if: (1) the AWWF froze in the residents’ automobile windshield washer reservoirs; or (2) froze when applied to the windshield while residents are driving.

If you have any questions, please contact us at (202) 872-8110.

Respectfully submitted,

D. Douglas Fratz  
Vice President, Scientific & Technical Affairs

Joseph T. Yost  
Senior Director, Strategic Issues Advocacy

Kristin Power  
Director, State Affairs – West Region

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<sup>1</sup> Board Resolution 12-32 is posted on the ARB website at: <http://www.arb.ca.gov/regact/2012/cp2012/res12-32.pdf>.

<sup>2</sup> CSPA is a voluntary, non-profit national trade association representing approximately 230 companies engaged in the manufacture, formulation, distribution, and sale of 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, polishes and floor maintenance products, and various types of aerosol products. Through its product stewardship program Product Care<sup>®</sup>, and scientific and business-to-business endeavors, CSPA provides its members a platform to effectively address issues regarding the health, safety, sustainability and environmental impacts of their products.

<sup>3</sup> CSPA filed written comments on October 15, 2012, and presented oral testimony at the Board’s public hearing on October 18, 2012.

<sup>4</sup> The text of Attachment B is posted on the ARB website at: <http://www.arb.ca.gov/regact/2012/cp2012/cp2012.htm>.

cc: Carla D. Takemoto, Chief, Area Source and Emissions Inventory Programs Branch, PTSD  
Jose Gomez, Manager, Technical Development Section, Area Source and Emissions  
Inventory Programs Branch, PTSD  
Olufemi Olaluwoye, Air Pollution Specialist, Technical Development Section, Area Source  
and Emissions Inventory Programs Branch, PTSD  
CSPA Air Quality Special Committee and Automotive Products Task Force  
Laurie E. Nelson, Randlett Nelson Madden Associates