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November 7, 2006

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Dr. Robert F. Sawyer, Chairman  
State of California Air Resources Board  
1001 "I" Street  
P.O. Box 2815  
Sacramento, CA 95812

**Reference: Rulemaking to Consider Adoption of Proposed Amendments to the California Consumer Products Regulations (November 16, 2006)**

Dear Dr. Sawyer:

The California Air Pollution Control Officers Association (CAPCOA) wishes to express its support for the California Air Resources Board's proposed amendments to the Consumer Products Regulation. Consumer products is among the largest emission source categories and as such, emissions reductions from this category is of critical importance to the state's efforts to improve air quality. California is home to some 38 million people – more than 10 percent of the entire country – and our population continues to grow. While the existing consumer product regulations are projected to achieve a 40% reduction in volatile organic compounds (VOC) by 2010, without additional controls, population growth is expected to reverse the downward trend of emissions from this source category.

California air districts are currently in the process of developing their air quality management plans for the State Implementation Plan (SIP) revisions required in June 2007. As you are aware, a large percent of the emission reductions needed to demonstrate attainment with the new federal and state 8-hour ozone standards originate from sources outside air district jurisdiction and under State or Federal authority.

Consumer products accounted for approximately 260 tons per day (tpd) of VOC emissions in 2005, which represents about eleven percent of the total anthropogenic VOC emissions statewide. The proposed 2006 amendments are designed to reduce this inventory by 11 tpd and meet the 2003 SIP commitments from this source category. In 2007, further amendments to this regulation will be discussed to secure emissions reductions beyond what was earmarked in the 2003 SIP. These reductions are critical to the districts' efforts to achieve the ozone standards. As identified in your staff report, emissions from Consumer Products in 2020 will be the largest source of VOC emissions in the South Coast Air Basin, (112 tpd) and the third largest source in the San Joaquin Valley Air Basin, (28 tpd) comprising 24.5 percent and 8.8 percent of VOC emissions in those areas, respectively.

CAPCOA concurs with the conclusion in the staff report that the proposed new limits are achievable and that the technology is feasible. With respect to automotive cleaning categories, for example, many air districts in California have witnessed successful use of water, soy-based and other low VOC cleaning materials in aerosol, as well as non-aerosol applications. This demonstrated technology, in particular, lends strong support to the achievability of CARB's proposed amendments to the brake cleaning, engine degreasing, general purpose degreasing and carburetor cleaning categories.

In conclusion, we urge your Board to adopt the staff recommendations for the 2006 amendments to California's Consumer Products Regulation. Keeping in mind however, the 11 tpd VOC reduction to be achieved statewide with these amendments represent only a fraction of the total inventory for consumer products, we also urge the Board to direct staff to aggressively pursue additional reductions in other consumer product categories for your Board's consideration in 2007. These actions are essential to local and state efforts to reach attainment of State and Federal air quality standards and to further protect the health of all Californians.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry R. Allen", with a long horizontal flourish extending to the right.

Larry R. Allen  
President