

AIR RESOURCES BOARD
Stationary Source Division
September 26, 1997

SUMMARY OF REVISIONS TO THE DRAFT GUIDELINES
FOR SPECIAL REPORTING REQUIREMENTS
FOR HAIRSPRAYS DATED 9/25/97

Background

- Deleted language on reporting requirements because they are fully explained in other sections.

Development Process Timeline

- This section deleted because it was originally developed as background information.

(#1) Responsibility for submitting compliance plans and periodic updates

- Deleted language that confused the reader on the use of the terms “responsible party” and “manufacturer”.
- Added emphasis that legal responsibility for compliance with the reporting requirements lies with the responsible party even if they are not the manufacturer/filler.
- Companies can use the ARB hairspray reporting form (new Attachment A) if they choose not to develop their own.
- For convenience, added the term “designated reporting party” to describe the organization designated by the responsible party to submit the compliance plan and periodic updates on their behalf.

(#2) Reporting options available to responsible party if they are not the manufacturer/filler

- New section gives responsible party option to submit information together or separately from the designated reporting party.

(#3) Use of ARB Reporting Form

- New section gives responsible party flexibility to develop own reporting form or use ARB form.

(#5) Circumstances for nonsubmittal of compliance plans or periodic updates

- New section identifying the circumstances where compliance plan or periodic update submittals may be waived.

(#6) Compliance plan information

- Clarified what is needed in a back-up plan and provided some examples of back-up plan options.

(#7) Periodic update information

- Deleted verbal reporting option because a written letter provides a physical record.

(#8) Confidentiality

- Clarified that ARB will maintain confidentiality of only information that is clearly designated by the reporting party as confidential.
- Changed Attachment A to Attachment B.

(#10) Reporting address

- Added street address for package mail and e-mail address for electronic submittals.

(#11) Data Reporting

- More flexible reporting format with the allowance of e-mail submittals.

(#12) Special reporting requirement language

- Changed Attachment B to Attachment C.

(#13) ARB staff contact

- Added ARB staff contact.