



Air Resources Board



Matthew Rodriguez
Secretary for
Environmental Protection

Mary D. Nichols, Chairman
1001 I Street • P.O. Box 2815
Sacramento, California 95812 • www.arb.ca.gov

Edmund G. Brown Jr.
Governor

March 26, 2012

Dear Sir or Madam:

I am writing to notify you of reporting requirements to be completed by responsible parties for Multi-purpose Lubricant and Penetrant products sold in California. Section 94513(f) of the Regulation for Reducing Emissions from Consumer Products (Consumer Products Regulation; title 17, California Code of Regulations, sections 94507 – 94517) stipulates the types of data to be reported for Multi-purpose Lubricant and Penetrant products sold, supplied, offered for sale, or manufactured for sale in California. The data are necessary for our assessment of the feasibility of the future 25 percent by weight volatile organic compound (VOC) limits for these products. The limits are scheduled to become effective on December 31, 2013.

Air Resources Board (ARB) staff requests that all information required by section 94513(f)(1) be submitted by June 26, 2012. Responsible parties or formulators for these products must report the following information:

- Data regarding product sales and composition for the year 2011, including information listed in section 94513(a) of the Consumer Products Regulation;
- A copy of the entire product label; and,
- A written update of the research and development efforts undertaken to achieve the 25 percent VOC limits specified in section 94509(a). You must include detailed information about the raw materials evaluated for use, maximum incremental reactivity values for any VOC or low vapor pressure-VOC used or evaluated, the function of the raw material evaluated, hardware used in product reformulation, the testing protocols used, the results of the testing, and the cost of reformulation efforts.

Enclosed, for your convenience, are forms and instructions for you to use to submit your information. If you are on track to comply, we are providing an option to only complete Form 1. If your reformulation efforts are still in progress, fill out Forms 1 through 6 in order to inform us of the research and development efforts taken to formulate a compliant product.

As always, all information that you designate as confidential will be handled strictly according to ARB confidentiality regulations. Please read and complete the enclosed

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.

California Environmental Protection Agency

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Confidential Information Form and return it with your reporting forms. A space is provided on each reporting form for you to clearly designate your submittal as confidential.

Thank you in advance for providing us with the information on your progress toward complying with the 25 percent VOC limit. The complete text of the Consumer Products Regulation can be found at: <http://www.arb.ca.gov/consprod/regs/gencregs.htm>. For information on upcoming activities relating to consumer products, please sign up for the consumer products list serve at <http://www.arb.ca.gov/listserv/consumer-products/consumer-products.htm>.

If you have questions, please do not hesitate to contact Mr. Robert Barrera, of my staff, at (916) 324-9549, or by email, at rbarrera@arb.ca.gov.

Sincerely,

Carla D. Takemoto, Chief
Area Source and Emission Inventory Programs Branch
Planning and Technical Support Division

Enclosures

cc: Mr. Robert Barrera
Air Resources Engineer
Implementation Section
Planning and Technical Support Division