

March 20, 1996

Dear Sir or Madam:

Consumer Products Mid-term Measures Survey

Enclosed you will find the Air Resources Board's (ARB/Board) Mid-term Measures 1994/1995 Consumer Products Survey. The purpose of the survey is to gather current information on California consumer products being considered for inclusion in the mid-term measures. The mid-term measures will reduce consumer product volatile organic compound (VOC) emissions, lessening the amount of ground-level ozone formation. Further details are explained below. I wish to thank the many industry representatives that have worked closely with us over the past several months to develop this survey. The enclosed survey information is divided into two parts:

Part 1: Instructions and Attachments

Survey Overview

Company Information Section Instructions

Product Information Packet Instructions

Attachments A through H

Part 2: Survey Forms

Company Information Section

Product Information Packet

Confidential Information Submittal Form

We ask that you complete the survey in as much detail as possible for those products sold in California during the 1995 calendar year. We have made every effort to make the survey user-friendly. The survey is also available on the Internet. To access the Mid-term Measures Survey on the World Wide Web, go to the California Air Resources Board Home Page at <http://www.arb.ca.gov>. Once you get on our home page, click on "CARB Programs and Information Resources," "Consumer Products Program," and finally on "Mid-term Measures Survey" under the heading "Mid-term Measures Development and Subgroup Activities". The survey is also available on disk upon request (see Attachment H of the survey). The completed Mid-term Measures Survey is due to the ARB by June 28, 1996.

What are the mid-term measures?

With the passage of the California Clean Air Act in 1988, the ARB was charged with reducing VOC emissions from consumer products. The mid-term measures is one of our commitments in California's State Implementation Plan (SIP) for ozone. In the SIP, the ARB committed to reduce statewide VOC emissions from consumer products by 25 percent from the 1990 baseline by the year 2005. We also committed to propose the mid-term measures for the Board's consideration in June 1997. This reduction is needed to achieve the national air

Sir or Madam

Page Two

quality standard for ozone throughout California. Through the implementation of the mid-term measures, we will make progress toward meeting California's SIP commitment for cleaner air.

Why is the Mid-term Measures Survey necessary?

To assist efforts to meet California's SIP commitment, the ARB staff is conducting a survey of companies that manufacture certain unregulated consumer products sold in California. The Mid-term Measures Survey will gather current California-specific information for the consumer product categories under consideration for the mid-term measures. The survey information will assist ARB staff in developing standards for the mid-term measures which are both technically and economically feasible. This request for information is made pursuant to sections 39607, 39701, and 41511 of the California Health and Safety Code and section 91100, Title 17, of the California Code of Regulations (CCR). These sections authorize the ARB to require the submission of information needed by the Board to estimate atmospheric emissions and to carry out its other statutory responsibilities.

How was the Mid-term Measures Survey developed?

A draft Mid-term Measures Survey was completed by ARB staff on October 31, 1995 and mailed to all members of a survey task force formed from the Mid-term Measures Subgroup of the Consumer Products Working Group (Subgroup). The Subgroup consists of consumer product manufacturers and their associations, and parties from federal, state, and local government who have expressed interest in participating in the development of the ARB's mid-term measures. Those parties interested in the development of the Mid-term Measures Survey form participated in conference calls with ARB staff on November 6 and December 12, 1995. In addition to conference calls and meetings held with the Subgroup, ARB staff members met individually with industry and association members upon request. After consideration of all information presented, a revised draft Mid-term Measures Survey was provided to the Subgroup at its January 18, 1996 meeting, with comments due to the ARB by February 9, 1996. After reviewing those comments received and conducting a conference call on February 14, 1996, ARB staff further revised the draft survey to produce the enclosed final Mid-term Measures Survey.

Who must complete the Mid-term Measures Survey?

Each company that receives the Mid-term Measures Survey must complete questions 1-8 of the Company Information Section of the survey. You must complete the Product Information Packet(s) only if your company is the responsible party for any of the product

Sir or Madam

Page Three

categories listed in Attachment A of the survey (please see Attachment D for the definition of responsible party).

If Mid-term Measures Survey information is claimed as confidential, how will it be treated?

The ARB has adopted regulations to protect the confidentiality of trade secrets (Title 17, CCR, sections 91000 to 91022). A summary of ARB confidentiality regulations can be found on page 12 of the survey, on the “Confidential Information Submittal Form”. You should fill out this form if you wish to designate any survey information as confidential. All information which you designate as confidential will be handled strictly in accordance with ARB confidentiality regulations. In order to ensure that information deemed confidential is clearly identified, we have provided a box at the top of each page of the survey form to be checked if confidential information is provided on that page. The ARB has many years of experience in handling confidential information and takes its responsibilities very seriously. All confidential information will be kept in locked file cabinets and will be accessible to authorized ARB staff on an “as needed” basis only.

In order to develop standards for consumer products that are both technically and economically feasible, it is essential that industry participate in this survey. Your response to the Mid-term Measures Survey will help the ARB develop technically and commercially feasible standards while achieving our SIP commitments. We appreciate the cooperation we have received to date from members of the consumer products industry and its associations, and hope to continue that cooperative spirit in this effort. We plan to continue to work closely with the Consumer Products Working Group and the Mid-term Measures Subgroup during the development of the mid-term measures.

We appreciate your promptness in meeting the Mid-terms Measures Survey completion requirements. If you have any questions regarding the completion of the survey, please contact Ms. Barbara Fry, Manager, Measures Development Section, at (916) 322-8267, or her staff, Ms. Lisa Kasper, at (916) 327-0648, or Mr. Paul Milkey, at (916) 327-1517. If you have specific questions concerning the product categories included in the survey, please contact the appropriate staff person listed in Attachment A.

Sincerely,

Signed by:
Genevieve A. Shiroma, Chief
Air Quality Measures Branch

Enclosures

Sir Madam

Page Four

cc: Ms. Barbara Fry
Manager, Measures Development Section
Stationary Source Division

Ms. Lisa Kasper
Measures Development Section
Stationary Source Division

Mr. Paul Milkey
Measures Development Section
Stationary Source Division