

## **Comment 1 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Neal

Last Name: Jennings

Email Address: neal@jbdewar.com

Affiliation: J.B. Dewar, Inc.

Subject: Auto VOC Standards Unreasonable

Comment:

Please see the attached comment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/1-cpwg2006-1.pdf'

Original File Name: cpwg2006-1.pdf

Date and Time Comment Was Submitted: 2006-10-05 14:32:06

3 Duplicates.

## **Comment 2 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Dave

Last Name: Woolsey

Email Address: DaveW@vacavalley.com

Affiliation:

Subject: Auto VOC Standards Unreasonable

Comment:

Please see the attached comment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/2-cpwg2006-2.pdf'

Original File Name: cpwg2006-2.pdf

Date and Time Comment Was Submitted: 2006-10-05 14:33:43

No Duplicates.

### **Comment 3 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Phil

Last Name: Fournier

Email Address: PFourn909@aol.com

Affiliation: Phil's Auto Clinic

Subject: Objection to Proposed Change in Regs for VOC's  
Comment:

Please see the attached comment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/3-cpwg2006-3.pdf'

Original File Name: cpwg2006-3.pdf

Date and Time Comment Was Submitted: 2006-10-05 14:35:20

No Duplicates.

## **Comment 4 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Skip

Last Name: Byrem

Email Address: starautopartssanjacinto@verizon.net

Affiliation:

Subject: VOC

Comment:

Please see the attached comment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/4-cpwg2006-4.pdf'

Original File Name: cpwg2006-4.pdf

Date and Time Comment Was Submitted: 2006-10-05 14:36:38

No Duplicates.

## **Comment 5 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Greg

Last Name: Peek

Email Address: gpeek@starautoparts.net

Affiliation:

Subject: Auto VOC Standards Unreasonable

Comment:

Please see that attached comment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/5-cpwg2006-5.pdf'

Original File Name: cpwg2006-5.pdf

Date and Time Comment Was Submitted: 2006-10-05 14:37:49

No Duplicates.

## **Comment 6 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Eddie

Last Name: Anderson

Email Address: eanderson@Penray.com

Affiliation:

Subject: Auto VOC Standards Unreasonable

Comment:

Please see that attached comment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/6-cpwg2006-6.pdf'

Original File Name: cpwg2006-6.pdf

Date and Time Comment Was Submitted: 2006-10-05 14:39:03

No Duplicates.

## **Comment 7 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Ron

Last Name: Christy

Email Address: rchristy@coastcounties.com

Affiliation:

Subject: Auto VOC Standards Unreasonable

Comment:

Please see that attached comment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/7-cpwg2006-7.pdf'

Original File Name: cpwg2006-7.pdf

Date and Time Comment Was Submitted: 2006-10-05 14:40:02

No Duplicates.

## **Comment 8 for Consumer Products (cpwg2006) - 45 Day.**

First Name: John

Last Name: Quilter

Email Address: jqulter@peoplepc.com

Affiliation: Association of California Car Clubs

Subject: Automotive Maintenance Products

Comment:

I take pride in maintaining my vehicles and are concerned about negative impact that these standards may have on my ability to find products that work for a given project.

I am also concerned that these new requirements could increase the time and cost that is necessary for me to maintain my vehicles.

Further, I am concerned that the ARB did not consider the impact of these standards on vintage vehicles that still have carburetors and require effective products to ensure that they remain operational in the years to come.

Due to these concerns we urge the ARB to reconsider its 10% VOC standards, and finally consider a compromise, to avoid the negative cost and performance consequences that could result for automotive enthusiasts and DIY consumers.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-10-06 20:21:46

No Duplicates.



## **Comment 9 for Consumer Products (cpwg2006) - 45 Day.**

First Name: David

Last Name: Riker

Email Address: davriker@digitalpath.net

Affiliation:

Subject: VOC Standards for Brake Cleaners and other Products

Comment:

I am concerned that the ARB's proposed 10% VOC standards for Brake Cleaners, Carburetor or Fuel-Injection Air Intake Cleaners, Engine Degreasers, and General Purpose Degreasers could prevent or hinder me from effectively cleaning and maintaining my classic vehicles.

Further, I am concerned that the ARB did not consider the impact of these standards on vintage vehicles that still have carburetors and require effective products to ensure that they remain operational in the years to come. Carburetors that are allowed to become dirty and clogged would cause more pollution than the proposed limits would prevent.

Finally, I believe that in an effort to find home-brewed solutions, people might use unsafe chemicals like gasoline, kerosene, and other dangerous solvents instead of safe, tested labeled cleaners available today, again, not only negating any benefit of reduced VOC products, but adding to the risk of fire and injury.

Sincerely,  
David Riker

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-10-07 07:42:49

No Duplicates.

## **Comment 10 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Gary

Last Name: Swauger

Email Address: garyswauger@sbcglobal.net

Affiliation:

Subject: ARB proposed 10% VOC standards for aerosol cleaners

Comment:

I believe in clean air. I also believe that necessary products need to be effective. Sometimes this means a trade-off.

It is fundamentally wrong to put limits on necessary products such as brake cleaner that severely limit their effectiveness.

I believe in education to enlighten us on the most effective way to use products wisely with respect to our environment.

Don't legislate ineffective cleaning products. Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-10-08 07:05:57

No Duplicates.

## **Comment 11 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Leonard

Last Name: Kahl

Email Address: llkahl@yahoo.com

Affiliation:

Subject: New Regulations

Comment:

I`m very opposed to the new State of California reguations re: VOC.  
Please reconsider and find another alternative to these  
regulations.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-10-08 07:25:35

No Duplicates.

## **Comment 12 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Adriel

Last Name: Rowley

Email Address: architect\_7@hotmail.com

Affiliation: Environmentalist and Auto Enthusiast

Subject: Requesting this nonsense to stop

Comment:

I am a hard core Environmentalist and believe that we need to protect the Earth before it is too late. But government or an entity taking some thing over is against the principles this Country was founded on. Why render some thing which is necessary for the well being of the vehicles and the occupant's and their safety as useless? The autos engine is the most important part of the car. Leaving grease and grime on it can cause over heating and other severe problems. The intakes need to also to be kept clean so the car is running on clean air. This allows the engine to run in the best way, and for the longest. These are just a coupe out of the many reasons that cleaners need to be effective. I know this form the year of auto training and lots of experiences. The poor only have so much money, and for them to keep on getting a car because it can not be maintained properly do to your actions would be horrific. Please work with the manufacture to reduce V.O.C. but still have an effective product. I do apologize if I am to blunt, but this does out rage me.

Sincerely,  
Adriel Rowley

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-10-08 12:12:19

No Duplicates.

## **Comment 13 for Consumer Products (cpwg2006) - 45 Day.**

First Name: William  
Last Name: Cochiolo  
Email Address: rbcochiolo@yahoo.com  
Affiliation:

Subject: New regulations  
Comment:

ARB,

I sure wish that you'd consider us vintage car owners in reducing the VOC's to 10%. It'll make maintenance more time consuming and expensive.

I'd prefer seeing the 55mph limit returned and enforced. This would be extremely unpopular but would not only make our roads safer and make a positive contribution to air quality. I am a CDL "big rig" licensed driver and have felt for a long time that the differential speed limits in California are a major hazzard to all drivers.

With respect, Russ.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-10-09 07:56:36

No Duplicates.

## **Comment 14 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Robert

Last Name: Murray

Email Address: bobmspeedster@yahoo.com

Affiliation:

Subject: please DO NOT change products

Comment:

Effective automotive maintenance provides very significant benefits to automotive enthusiasts and DIY consumers through improved automotive safety, extending vehicle and auto part life spans, and enhancing the appearance of new and vintage vehicles.

We are concerned that the ARB's proposed 10% VOC standards for Brake Cleaners, Carburetor or Fuel-Injection Air Intake Cleaners, Engine Degreasers, and General Purpose Degreasers could prevent or hinder consumers from effectively cleaning and maintaining our vehicles.

We take pride in maintaining our vehicles and are concerned about negative impact that these standards may have on our ability to find products that work for a given project.

We are also concerned that these new requirements could increase the time and cost that is necessary for us to maintain our vehicles.

Further, we are concerned that the ARB did not consider the impact of these standards on vintage vehicles that still have carburetors and require effective products to ensure that they remain operational in the years to come.

We are also concerned that the products that would be mandated by these standards could damage the sensitive components of vintage vehicles, or leave residues on vital vehicle systems.

Due to these concerns we urge the ARB to reconsider its 10% VOC standards, and finally consider a compromise, to avoid the negative cost and performance consequences that could result for automotive enthusiasts and DIY consumers.

Please do not change these products

Thanks

Bob

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-10-09 08:04:40

No Duplicates.

## **Comment 15 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Steve

Last Name: Phillips

Email Address: cpwg2006

Affiliation: Auto Parts Wholesalers

Subject: lowering VOC standards

Comment:

You people at CARB have bigger issues to deal with then lowering the VOC of already low standards,which manufacturers of brake and carb. cleaners have done for California only.What you will force,is companies that have locations outside California will ship the noncal. products in their own trucks to locations within California.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-10-09 20:04:17

No Duplicates.



## **Comment 16 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Hugh

Last Name: Rose

Email Address: hugh.rose@comcast.net

Affiliation:

Subject: Opposition to Changes in Consumer Products formulations

Comment:

Please consider the needs of the community when you look at changing consumer product formulations. Items that I personally use such as brake cleaners for automotive use can affect my, and your safety on the road. The non-solvent based products leave oily residues that impair brake performance.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-10-10 08:09:36

No Duplicates.

## **Comment 17 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Robert

Last Name: Moritsugu

Email Address: RMoritsugu@aol.com

Affiliation:

Subject: cpwg2006

Comment:

I am writing to tell you I am against changes forcing the suppliers of aftermarket automotive cleaners to dilute their products. There have been no reliable studies that I have been able to find which shows that this will impact air quality in any way, yet they will render the products practically useless.

Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-10-10 08:42:09

No Duplicates.

## **Comment 18 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Randel

Last Name: Tom

Email Address: tomb993@hotmail.com

Affiliation:

Subject: Reducing VOC for various automotive cleaners

Comment:

Please do not take any measures that will render various automotive cleaners, like fuel injector cleaners, brake cleaners, etc, less effective.

Many of these products are already very weak. A clean fuel system is critical for low emissions. Making these cleaners weaker will only increase automotive emissions.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-10-10 10:30:32

No Duplicates.

## **Comment 19 for Consumer Products (cpwg2006) - 45 Day.**

First Name: David

Last Name: Epperson

Email Address: eppersondavid@yahoo.com

Affiliation: Citizen of the Great State of California

Subject: C.P.W.G. 2006

Comment:

Pleas equit picking on the auto industry. 99% of the pollution emitted by cars has been eliminated - now you pursue the last 1% like Ahab chasing the white whale.

Give it up - we need these products, esp. the fuel injection cleaners you've targeted. No matter what you say, the watered down, more expensive versions of the important fuel additives will not work.

And, when will enough be enough. Quit ebeing so worried about the air quality. We all survived the 60's and 70's in So Cal - the air in greatly improved, thanks in part to you, but give up already. You are starting to stifle the economy of this once great state. All your machinations towards these new targets of yours will come no where close to reducing the airborne particles, smoke and pollution from jsut a wekk of the last "Day" forest fire. Stop your overreaching policies today!

David Epperson  
Upland, CA

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-10-10 12:13:15

No Duplicates.

## **Comment 20 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Mark

Last Name: Julian

Email Address: markanthonyjulian@gmail.com

Affiliation:

Subject: 10% VOC Standards

Comment:

Has a single study been conducted on the effectiveness of the products which would have to replace those current products not meeting this proposed standard?

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-10-10 16:11:24

No Duplicates.

## **Comment 21 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Mark  
Last Name: Collatz  
Email Address: mark.collatz@ascouncil.org  
Affiliation: Adhesive and Sealant Council

Subject: RE: Air Resources Board's Third Staff Proposal for Regulation Changes to the Consumer Pro  
Comment:

David Mallory  
Manager, Stationary Source Division  
Air Resources Board  
California Environmental Protection Agency  
1000 I Street  
Sacramento California 95812

Judy Yee  
Manager, Stationary Source Division  
Air Resources Board  
California Environmental Protection Agency  
1000 I Street  
Sacramento California 95812

RE: Air Resources Board's Third Staff Proposal for Regulation Changes to the Consumer Products Regulation at the November 16 Board Hearing

Dear Mr. Mallory and Ms. Yee:

The Adhesive and Sealant Council, Inc. (ASC) is a North American based trade association representing 120 manufacturers of adhesives and sealants and suppliers of raw materials to the industry.

As you are aware ASC and its members have been working with you and others on the Air Resources Board (ARB) staff for several months to revise the volatile organic content limit for the category of construction, panel and floor covering adhesives in the California consumer products regulation. After reviewing the ARB's third staff proposal issued on August 25, it is the agreement of ASC's manufacturing members that a limit of 7 percent for this category is technologically achievable.

It should be noted that within the industry concerns remain with regard to subfloor adhesives at this reduced level being used to bond some of the new technological materials that either exhibit low surface energy or building materials that have been chemically treated to resist mold or pest infestation. As in the past adhesive manufacturers will continue working in the area of research and development to meet the challenges this new lower limit will present for these particular types of applications.

In addition, manufacturers recognize ARB's interest in eliminating the three chlorinated compounds: methylene chloride,

perchloroethylene and trichloroethylene from this product category. Allowing for the continued use of these compounds in the manufacturing process

Page 2  
October 12, 2006

through December 2008 with a sell-through provision of December 2011 that permits a systematic inventory reduction seems to be a reasonable approach to the eventual elimination of the compounds from this product category.

As always, it has been my pleasure to work with you and your staff in developing a reasonable new limit for this category and I look forward to continuing this effort as we begin to address the caulk and sealant category later this year.

Best regards,

Mark Collatz  
Director of Government Relations  
Adhesive and Sealant, Council, Inc.

cc: Janette Brooks, California ARB, Air Quality Measures Branch  
Chief

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-10-12 06:44:35

No Duplicates.

## **Comment 22 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Jerry

Last Name: Keuroghlian

Email Address: novaauto@sbcglobal.net

Affiliation: Nova Automotive Inc.

Subject: Auto VOC Standards Unreasonable

Comment:

Please see the attached comment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/22-cpwg2006-22.pdf'

Original File Name: cpwg2006-22.pdf

Date and Time Comment Was Submitted: 2006-10-12 08:48:49

No Duplicates.



## **Comment 23 for Consumer Products (cpwg2006) - 45 Day.**

First Name: John

Last Name: Peters

Email Address: jpeters235@aol.com

Affiliation:

Subject: 10% VOC Standard

Comment:

I'm an avid user of Automotive Appearance chemicals and I'm told that the effectiveness of chemicals that meet the proposed 10% VOC standard will not meet my expectations for effectiveness.

I like clean air and a safe environment but I question if you have properly thought through the impact this new standard will have on the car cleaning industry.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-10-12 14:52:46

No Duplicates.

## **Comment 24 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Bob  
Last Name: Bodine  
Email Address: bbodine@earthlink.net  
Affiliation:

Subject: 10% VOC standards  
Comment:

I am concerned that the ARB's proposed 10% VOC standards for Brake Cleaners, Carburetor or Fuel-Injection Air Intake Cleaners, Engine Degreasers, and General Purpose Degreasers could damage the ability to effectively clean and maintain vehicles and their parts.

Has the ARB considered the potential hazards that may be caused by residues on brake parts automotive, or the safety benefits of effective brake maintenance, replacement, and repair.

You must reconsider your 10% VOC standards and finally consider a compromise that would not endanger effective maintenance of automobiles in California.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-10-14 07:51:45

No Duplicates.

## **Comment 25 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Aaron

Last Name: Lowe

Email Address: aaron.lowe@aftermarket.org

Affiliation: Automotive Aftermarket Industry Associat

Subject: Comments on VOC Emission Standards

Comment:

Please see the attached letter regarding comments for the VOC emission standards.

Thank you,

Aaron Lowe

VP, Government Affairs

Automotive Aftermarket Industry association.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/25-october\_16\_\_2006-voc\_emission\_standards\_comments.doc'

Original File Name: October 16, 2006-VOC Emission Standards Comments.doc

Date and Time Comment Was Submitted: 2006-10-16 07:59:25

No Duplicates.

## **Comment 26 for Consumer Products (cpwg2006) - 45 Day.**

First Name: David

Last Name: Scher

Email Address: davidscher@pacbell.net

Affiliation:

Subject: Please read this!

Comment:

Effective automotive maintenance provides very significant benefits to consumers through improved automotive safety, extending vehicle and part life spans, minimizing automotive air emissions, and lowering energy use.

Proper vehicle system maintenance is absolutely essential to maintaining the proper wear of automotive parts like brakes, carburetors, engines, and others.

We are concerned that the ARB's proposed 10% VOC standards for Brake Cleaners, Carburetor or Fuel-Injection Air Intake Cleaners, Engine Degreasers, and General Purpose Degreasers could damage the ability to effectively clean and maintain vehicles and their parts.

We are also concerned that the ARB has not considered the potential hazards that may be caused by residues on brake parts automotive, or the safety benefits of effective brake maintenance, replacement, and repair.

Therefore, we are asking the ARB to reconsider its 10% VOC standards and finally consider a compromise that would not endanger effective maintenance of automobiles in California.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-10-17 08:07:58

No Duplicates.

## **Comment 27 for Consumer Products (cpwg2006) - 45 Day.**

First Name: William

Last Name: Chase

Email Address: billnpat20@sbcglobal.net

Affiliation:

Subject: Consumer Product Regulations

Comment:

As a person who is actively involved in car issues and a driver of a classic vehicle, and because I do all of my own maintenance and repairs, I am concerned that you are considering requirements for the reduction of VOC content of the very products that I use and expect to work properly. If products have to be reformulated to meet some arbitrary standard set by people who have little understanding of how products work, then it is likely that the reformulated products will not perform as well as they should or they could damage my vehicles.

Please reconsider any further reformulation of the four categories of automotive products. Thank you for consideration of my request.

Bill Chase

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-10-18 16:00:49

No Duplicates.

## **Comment 28 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Michael

Last Name: Zimmerman

Email Address: mike.zimmerman@permatex.com

Affiliation:

Subject: Proposed VOC standards for brake cleaners, etc.

Comment:

To the ARB Board:

I believe that the proposed 10% standard on automotive brake cleaners, degreasers, carb cleaners and general degreasers will lead to products that don't work very well. This reduction from 45% VOC to 10% VOC on an already-regulated product category will cause the users of these products to either:

use more  
seek alternative products  
make do with poor performance. This is not a good option when we are speaking of brake work.

Please re-consider.

Sincerely,

Michael Zimmerman  
General Manager of Permatex

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-10-19 06:28:17

No Duplicates.

## **Comment 29 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Robert

Last Name: Hirsch

Email Address: bhirsch@goldeagle.com

Affiliation:

Subject: VOC regulations

Comment:

Automotive aftermarket manufacturers have continually done their best to comply with ongoing regulations. The latest proposal will put some companies out of business and severely affect mechanics ability to perform needed automotive maintenance. This will negatively affect the environment. Please back off on this proposal.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-10-19 08:14:19

No Duplicates.

## **Comment 30 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Timothy

Last Name: Stitt

Email Address: tstitt@goldeagle.com

Affiliation:

Subject: Proposed VOC Regulations

Comment:

Automotive maintenance provides a very significant benefit to consumers through improved safety, extended vehicle life, reduced emissions and lower energy consumption. The proposed 10% VOC standards on various cleaning products could drastically damage the ability of maintenance professions to effectively clean and maintain essential parts systems on vehicles. The current standards are in place and have effectively created an awareness of the need to monitor air quality. To go further could actually negatively effect the environment. Please reconsider the emphasis on further reductions to 10% VOC.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-10-20 11:15:49

No Duplicates.



## **Comment 31 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Doug

Last Name: Raymond

Email Address: [djraymond@reg-resources.com](mailto:djraymond@reg-resources.com)

Affiliation: Raymond Regulatory Resources (3R)

Subject: Rubber & Vinyl Protectant Definition

Comment:

Please see attached

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/33-rubbervinyldefinitioncarbcontinued1.doc>'

Original File Name: RubberVinylDefinitionCARBcontinued1.doc

Date and Time Comment Was Submitted: 2006-10-23 14:41:15

No Duplicates.

## **Comment 32 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Jason

Last Name: Toups

Email Address: jason\_toups@npd.com

Affiliation:

Subject: new C.A.R.B. VOC proposals

Comment:

Please stop destroying the automotive aftermarket industry, per your proposals on the VOC reduction in automotive chemical products! It is merely another veiled attempt by C.A.R.B. to hurt this industry in the guise of being "environmentally sound". People outside of California do not support this banter! Help us now by removing this proposed change that will only hurt the chemical manufacturers and in turn hurt us, the consumers who use these products.

By proposing a 10% reduction in VOC's, you will not stop their effects at all! You will simply cause us to have to use more of the product to achieve the same effectiveness, and therefore purchase more of it to do so. It's nothing more than symantics, and therefore a "lose-lose" situation!

Your proposal is wrong for the automotive industry as a whole! Please, stop it NOW!

Sincerely,  
Jason Toups  
DIY'er and concerned consumer.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-10-23 18:10:00

No Duplicates.

## **Comment 33 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Richard  
Last Name: Pearl  
Email Address: pearl@floridachemical.com  
Affiliation: Florida Chemical Company

Subject: Unreasonable 10% VOC Standards for Automotive Maintenance Products  
Comment:

October 19, 2006

David Mallory, P.E.  
Manager, Measures Development Section, Stationary Source Division  
California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

Re: Unreasonable 10% VOC Standards for Automotive Maintenance Products

Dear Mr. Mallory:

The Florida Chemical Company and its 45 employees are very concerned about the Air Resources Board's (ARB's) 10 % VOC emission standards for the four automotive maintenance product categories in the proposed 2006 Amendments to California's Consumer Products Regulation.

The proposed 10% VOC standard for Brake Cleaners, Carburetor or Fuel-Injection Air Intake Cleaners, Engine Degreasers, and General Purpose Degreasers will destroy the ability to manufacture automotive maintenance products that are used to effectively clean and maintain vehicles.

Florida Chemical Company manufactures and markets a variety of citrus by-products that are useful to companies manufacturing products in these categories for sale in California. The impact of these standards would negatively impact automotive maintenance personnel, classic automobile enthusiasts, and anyone who owns or operates a motor vehicle in California. Proper vehicle maintenance is essential to maintaining the safety of automobiles and the proper wear of automotive parts like brakes, carburetors, engines, and others.

Specifically, Florida Chemical is concerned that the ARB has not considered the potential hazards that may be caused by residues on automotive brake parts or other vital automotive parts. We are also concerned that the proposed standards will increase costs to the automotive service industry and to consumers due to the additional time required for brake jobs and other degreasing operations from additional drying time and less effective products. Florida Chemical is also concerned that the ARB has not considered benefits of effective engine maintenance in reducing automotive VOC, nitrogen oxide, and particulate matter air

emissions. In addition, the ARB has not considered the inability to use low-vapor pressure (LVP) ingredients to reformulate these products and the negative impacts of oily residues in air intake systems that can collect soils from the air. The ARB has also failed to consider current limitations to carburetor or fuel-injection air intake cleaner formulations due to the U.S. EPA's required registration of fuel additives. Finally, Florida Chemical is seriously concerned that these 10% VOC standards will result in the essential elimination of these product categories and the use of non-regulated solvents, like gasoline, in these applications.

Our industry has already reduced emissions from these products and has offered to make additional reductions. However the current proposed 10% VOC standards are not a reasonable compromise, nor are the proposed limits technologically and commercially feasible.

Therefore we strongly suggest that the ARB withdraw the 10% VOC standards and propose a more reasonable regulatory limit that will protect California's air quality without having such a severe negative impact on these vitally important automotive maintenance products.

Sincerely,

Richard Pearl  
Regulatory Affairs

cc: Andrew Hackman, ASPA  
D. Douglas Fratz, CSPA  
Joseph Yost, CSPA

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/35-fcc\\_letter\\_to\\_carb\\_concerning\\_proposed\\_auto\\_voc\\_limits.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/35-fcc_letter_to_carb_concerning_proposed_auto_voc_limits.doc)'

Original File Name: FCC Letter to CARB Concerning Proposed Auto VOC Limits.doc

Date and Time Comment Was Submitted: 2006-10-24 06:46:23

No Duplicates.

## **Comment 34 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Roger

Last Name: Vanderlaan

Email Address: rvanderlaan@shieldpackaging.com

Affiliation:

Subject: Rubber & Vinyl Protectant proposed definition change

Comment:

Please see attachment.

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/36-carb\\_shield\\_letter\\_10-23-06.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/36-carb_shield_letter_10-23-06.pdf)'

Original File Name: CARB Shield Letter 10-23-06.pdf

Date and Time Comment Was Submitted: 2006-10-24 11:17:50

No Duplicates.

## **Comment 35 for Consumer Products (cpwg2006) - 45 Day.**

First Name: j  
Last Name: Ulrich  
Email Address: julrich@fourstarchemical.com  
Affiliation:

Subject: Rubber & Vinyl Protectant Definition Change  
Comment:

October 23, 2006

Clerk of the Board  
Air Resources Board  
1001 I Street  
P.O. Box 2815  
Sacramento, California 95812

Subject: Rubber & Vinyl Protectant Definition Change

Dear Clerk of the Board,

Four Star appreciates the opportunity to comment on the current rulemaking. Four Star is a small business in California and a filler of aerosol products. We fill products for the automotive market. Our customers rely on us to formulate effective and efficient products for the consumer's use.

The proposed change in the Technical Support Document involving the Rubber and Vinyl Protectant will have a substantial impact on our tire coating product. The proposed change will classify our coating product as a protectant. Our coating product will not be effective at the VOC level for protectants. Currently our coating product meets the aerosol coating regulation definition of containing a resin and producing a film. If the proposed definition is not modified our product will be banned.

Furthermore, Four Star was under the understanding that the Rubber and Vinyl Protectant (aerosol) was not to be surveyed until the next survey. However, the Technical support document states that some marketers reported early. Was there a formal notice of this survey? Four Star was unaware of this opportunity. We request that this issue be postponed until the next survey as previously noticed.

Thank you for your time and consideration to this issue.

Sincerely,

Jerry Ulrich  
Four Star Chemical  
President

cc: Robert D. Fletcher, P.E., Division Chief, Stationary Source Division

Robert D. Barham, Ph.D., Assistant Division Chief, Stationary Source Division

Janette M. Brooks, Chief, Air Quality Measures Branch, Stationary Source Division

David Mallory, Manager, Measures Development, Stationary Source Division

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/37-carb\\_10-23-06.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/37-carb_10-23-06.pdf)'

Original File Name: carb 10-23-06.pdf

Date and Time Comment Was Submitted: 2006-10-24 14:37:00

No Duplicates.

## **Comment 36 for Consumer Products (cpwg2006) - 45 Day.**

First Name: D. Douglas

Last Name: Fratz

Email Address: dfratz@cspa.org

Affiliation: Consumer Specialty Products Association

Subject: Initial CSPA Comments on 2006 Consumer Products Rule Amendments

Comment:

Please see the attached zip file.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/43-cspa\_comment\_\_attachment.zip'

Original File Name: CSPA Comment & Attachment.zip

Date and Time Comment Was Submitted: 2006-10-24 15:42:11

No Duplicates.



## **Comment 37 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Joe

Last Name: Stout

Email Address: Non-web submitted comment

Affiliation: Kraft Foods

Subject: Amendments to the CA Consumer Products Reg

Comment:

Please see the attached comment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/44-cpwg2006-37.pdf'

Original File Name: cpwg2006-37.pdf

Date and Time Comment Was Submitted: 2006-10-24 15:50:51

No Duplicates.

## **Comment 38 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Kenneth

Last Name: Haselhorst

Email Address: faccc\_55\_57@hotmail.com

Affiliation:

Subject: ARB's proposed 10% VOC standards

Comment:

Effective automotive maintenance provides very significant benefits to consumers through improved automotive safety, extending vehicle and part life spans, minimizing automotive air emissions, and lowering energy use.

We are concerned that the ARB's proposed 10% VOC standards for Brake Cleaners, Carburetor or Fuel-Injection Air Intake Cleaners, Engine Degreasers, and General Purpose Degreasers could damage our ability to effectively clean and maintain vehicles

We are also concerned that the ARB has not considered the potential hazards that may be caused by residues on brake parts automotive, or the safety benefits of effective brake maintenance and repair.

We also believe that these new standards could have negative cost impacts to the automotive service industry and consumers due to the additional time required for brake jobs and other maintenance caused by using slower-drying and less effective brake cleaners and other automotive maintenance products. Time is extremely valuable in this profession; and lost time has serious negative impacts on our businesses.

Therefore, we are asking the ARB to reconsider its 10% VOC standards, and finally consider a compromise, so that we are not endangered in our ability to provide cost-effective maintenance to automotive consumer in California.

Thank you for listening to consumer's comments.  
Ken H.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-10-24 21:12:06

No Duplicates.

## **Comment 39 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Gary  
Last Name: Silvers  
Email Address: gsilvers@meguiars.com  
Affiliation: Meguiar's Inc.

Subject: Rubber & Vinyl Protectant Definition Change  
Comment:

See attached uploaded file.

Thank you

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/46-carb\_hot\_shine\_tire\_coating\_ltr..pdf'

Original File Name: CARB Hot Shine Tire Coating Ltr..pdf

Date and Time Comment Was Submitted: 2006-10-25 14:16:19

No Duplicates.

## **Comment 40 for Consumer Products (cpwg2006) - 45 Day.**

First Name: John  
Last Name: Davis  
Email Address: jdavis@plaze.com  
Affiliation: Plaze, Inc.

Subject: Rubber and Vinyl Protectans  
Comment:

See attachment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/47-carbplaze.doc'

Original File Name: CARBPLAZE.doc

Date and Time Comment Was Submitted: 2006-10-26 14:59:38

No Duplicates.

## **Comment 41 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Tim

Last Name: Cunningham

Email Address: tkcunningham@ashland.com

Affiliation:

Subject: ARB Ruling

Comment:

Effective automotive maintenance provides very significant benefits to consumers through improved automotive safety, extending vehicle and part life spans, minimizing automotive air emissions, and lowering energy use.

Proper vehicle system maintenance is absolutely essential to maintaining the proper wear of automotive parts like brakes, carburetors, engines, and others.

We are concerned that the ARB's proposed 10% VOC standards for Brake Cleaners, Carburetor or Fuel-Injection Air Intake Cleaners, Engine Degreasers, and General Purpose Degreasers could damage the ability to effectively clean and maintain vehicles and their parts.

We are also concerned that the ARB has not considered the potential hazards that may be caused by residues on brake parts automotive, or the safety benefits of effective brake maintenance, replacement, and repair.

Therefore, we are asking the ARB to reconsider its 10% VOC standards and finally consider a compromise that would not endanger effective maintenance of automobiles in California.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-10-27 09:02:43

No Duplicates.

## **Comment 42 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Stephen

Last Name: Smith

Email Address: stephenmsmith14@yahoo.com

Affiliation:

Subject: Reduction of VOC limits in car care products

Comment:

To Whom it may concern:

While I appreciate your efforts to reduce the VOC content of consumer and industrial products and protect our environment, the result of your efforts is the rapidly escalating cost of the services and products affected by your limitations. Unless you have a plan in place to manufacture these products within the proposed regulations that will neither diminish their effectiveness nor increase the cost, I suggest you look at alternative ways to protect the environment. The disparity in gasoline prices between California and the rest of the U.S. is a good example of the fact that only limitations are brought to the table, not solutions. The result is the consumer bearing the brunt of these so-called "improvements". Please consider my input when deciding the future of automotive care products, as the rest of our nation will continue using the same products, regardless of what is decided in California.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-10-27 09:10:33

No Duplicates.

## **Comment 43 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Fred

Last Name: Celaya

Email Address: fcelaya@ashland.com

Affiliation:

Subject: 10% VOC proposed standard

Comment:

Effective automotive maintenance provides very significant benefits to automotive enthusiasts and DIY consumers through improved automotive safety, extending vehicle and auto part life spans, and enhancing the appearance of new and vintage vehicles.

We are concerned that the ARB's proposed 10% VOC standards for Brake Cleaners, Carburetor or Fuel-Injection Air Intake Cleaners, Engine Degreasers, and General Purpose Degreasers could prevent or hinder consumers from effectively cleaning and maintaining our vehicles.

We take pride in maintaining our vehicles and are concerned about negative impact that these standards may have on our ability to find products that work for a given project.

We are also concerned that these new requirements could increase the time and cost that is necessary for us to maintain our vehicles.

Further, we are concerned that the ARB did not consider the impact of these standards on vintage vehicles that still have carburetors and require effective products to ensure that they remain operational in the years to come.

We are also concerned that the products that would be mandated by these standards could damage the sensitive components of vintage vehicles, or leave residues on vital vehicle systems.

Due to these concerns we urge the ARB to reconsider its 10% VOC standards, and finally consider a compromise, to avoid the negative cost and performance consequences that could result for automotive enthusiasts and DIY consumers.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-10-27 09:22:57

No Duplicates.

## **Comment 44 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Linda

Last Name: Cochran

Email Address: lcochran@ashland.com

Affiliation:

Subject: Proposed Amendments to VOC Regulations - California

Comment:

Effective automotive maintenance provides very significant benefits to consumers through improved automotive safety, extending vehicle and part life spans, minimizing automotive air emissions, and lowering energy use.

Proper vehicle system maintenance is absolutely essential to maintaining the proper wear of automotive parts like brakes, carburetors, engines, and others.

We are concerned that the ARB's proposed 10% VOC standards for Brake Cleaners, Carburetor or Fuel-Injection Air Intake Cleaners, Engine Degreasers, and General Purpose Degreasers could damage the ability to effectively clean and maintain vehicles and their parts.

We are also concerned that the ARB has not considered the potential hazards that may be caused by residues on brake parts automotive, or the safety benefits of effective brake maintenance, replacement, and repair.

Therefore, we are asking the ARB to reconsider its 10% VOC standards and finally consider a compromise that would not endanger effective maintenance of automobiles in California.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-10-27 09:37:05

No Duplicates.



## **Comment 45 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Pat

Last Name: Navarro

Email Address: panavarro@ashland.com

Affiliation:

Subject: Effective Vehicle Maintenance

Comment:

We feel that the upcoming ARB's proposed VOC standards for cleaners and degreasers would greatly damage our ability to reap the benefits of effective vehicle maintenance. It would also impact costs because of the additional time required for automotive maintenance to compensate for less effective cleaners. We feel that long-term testing be carried out prior to any enforcement of these standards.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-10-27 09:46:40

No Duplicates.

## **Comment 46 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Daniel  
Last Name: Wagner  
Email Address: daniel@issa.com  
Affiliation: ISSA

Subject: Comments on Proposed Amendments to Consumer Products Regulations  
Comment:

Attached please find ISSA's comments on the proposed amendments to the Consumer Products Regulations

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/55-ca.voc.comm.oct.06.doc'

Original File Name: CA.VOC.comm.Oct.06.doc

Date and Time Comment Was Submitted: 2006-10-27 13:17:45

No Duplicates.

## **Comment 47 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Andrew  
Last Name: Hackman  
Email Address: ahackman@cspa.org  
Affiliation: Automotive Specialty Products Alliance

Subject: Comments on ARB's Proposed 2006 Amendments to the California Consumer Products Regulation

Comment:

Dear Air Resources Board Members:

Attached please find the Automotive Specialty Products Alliance's (ASPA) comments on the proposed 2006 Amendments to the California Consumer Products Regulation and the Aerosol Coatings Regulation, dated September 29, 2006. ASPA looks forward to working with the ARB to develop commercially and technologically feasible VOC emissions standards that will meet the clean air needs of California and allow our members to continue to provide essential products to consumers.

Please feel free to contact me directly if you have any questions on these comments.

Thank you,

Andy Hackman  
The Automotive Specialty Products Alliance  
P: (202) 833-7328  
F: (202) 872-8114

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/56-aspa\_comments\_on\_agenda\_item\_\_\_06-10-8.zip'

Original File Name: ASPA Comments on Agenda Item # 06-10-8.zip

Date and Time Comment Was Submitted: 2006-10-27 13:28:28

No Duplicates.

## **Comment 48 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Kenneth E.  
Last Name: Forbes  
Email Address: keforbes@ashland.com  
Affiliation: Ashland Inc. Fairfield, CA

Subject: VOC Reduction in Consumer Products-Automotive Cleaners  
Comment:

October 27, 2006

Attention: State of California, Air Resources Board (ARB),

Please DO NOT amend the present limits of VOC in consumer products used in the automotive industry, specifically brake cleaners, engine degreasers and general degreaser and carburetor and fuel injection cleaners.

These proposed amendments fail to fully consider the long-term safety aspect related to reformulation. A thorough, controlled study of the efficacy of the proposed reformulations has yet to be completed. The data obtained on the alternative automotive cleaners used in the 2005 IRTA Wolf study primarily employed soy oil/acetone blends, Simple Green and water based blends. The study itself appears to be cursory, incomplete and uncontrolled. For example, how much effort was used in each location, with each cleaner, to exact a degree of cleanliness? How "clean" was "clean" in the cleaning descriptions, which appear to be somewhat subjective? Were there controls for each cleaning situation? Was it a double-blind study? How much residue was left in each "cleaning" compared to solvents in use now? Were cleaners with other VOC-exempt compounds such as PCBTF and Methyl Acetate looked at? If not, then why not? These are also effective non-VOC solvents that were not used with soy oil in the study.

These questions do not appear to be answered in this study. They should be answered prior to any VOC content amendments for automotive consumer products.

To remove effective cleaners for safety-sensitive equipment used on California roadways without fully studying the safety and reliability aspect in an effort to achieve a relatively minor reduction in VOC emissions is unwise, unacceptable to those who presently formulate safe and highly-effective cleaners, and not in the best interests of Californians who depend on the quality products from respected manufacturers like Valvoline and Aervoe Industries, who have already reduced VOCs on these products one before.

More study is clearly needed with a more detailed look into safety, efficacy and a true cost-benefit analysis.

I respectfully ask you to seriously consider these comments and questions related to proposed major changes that ARB would mandate in the VOC content of automotive consumer products. Our vehicle

assets, performance and most of all, our safety are at stake here.

Thank you,

Ken Forbes  
Analytical Chemist  
Quality Assurance Laboratory  
Ashland Distribution  
Division of Ashland Inc.  
2461 Crocker Circle  
Fairfield, CA 94533  
707-437-4000 x 607  
keforbes@ashland.com  
<http://www.cspa.org/keepcarsrolling/>

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-10-27 17:17:42

No Duplicates.

## **Comment 49 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Brian

Last Name: Holmes

Email Address: baholmes@ashland.com

Affiliation: Ashland Distribution

Subject: VOC Reduction in Consumer Products-- Automotive Cleaners

Comment:

Please be sure to review the safety conditions of moving from a non flammable material ( Chlorinated )to one that is extremely flammable ( Acetone) .This will compromise many of the shops that will have to move from a "safe" solvent blend to a highly flammable blend. As a comparison , you may want to look at the furniture industry that was forced by regulation to make a simimlar move and the fires at their establishments that this caused. Many were put out of business --others probably faced much higher insurance costs.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-10-30 09:43:04

No Duplicates.

## **Comment 50 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Harry

Last Name: Zechman

Email Address: Non-web submitted comment

Affiliation: Stoner

Subject: Rubber and Vinyl Protectant Definition Change

Comment:

Please see the attached comment.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/60-cpwg2006-50.pdf>'

Original File Name: cpwg2006-50.pdf

Date and Time Comment Was Submitted: 2006-10-31 10:13:01

No Duplicates.

## **Comment 51 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Michael

Last Name: Bell

Email Address: Non-web submitted comment

Affiliation: BAF Industries

Subject: Rubber and Vinyl Protectant Definition

Comment:

Please see the attached comment.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/61-cpwg2006-51.pdf>'

Original File Name: cpwg2006-51.pdf

Date and Time Comment Was Submitted: 2006-10-31 10:18:32

No Duplicates.



## **Comment 52 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Gregory

Last Name: Johnson

Email Address: Gregory.L.Johnson@sherwin.com

Affiliation: Sherwin-Williams Diversified Brands

Subject: Consumer Products Regulation-Rubber and Vinyl Protectant Definition

Comment:

Please see the attached comment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/62-cpwg2006-52.pdf'

Original File Name: cpwg2006-52.pdf

Date and Time Comment Was Submitted: 2006-10-31 10:20:56

No Duplicates.

## **Comment 53 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Edward  
Last Name: Piszynski  
Email Address: episzynski@bvaerosol.com  
Affiliation: Bridgeview Aerosol, LLC

Subject: Unreasonable 10% VOC Standards for Automotive Maintenance Products  
Comment:

BRIDGEVIEW AEROSOL, LLC  
8407 South 77th Avenue  
Bridgeview, IL 60455

Laboratory Phone: 708-237-4345  
Laboratory Fax: 708-598-6513

November 1, 2006

Submit to:  
dmallory@arb.ca.gov  
and via:  
[http://www.arb.ca.gov/lispub/comm/bcsubform.php?listname=cpwg2006&comm\\_period=A](http://www.arb.ca.gov/lispub/comm/bcsubform.php?listname=cpwg2006&comm_period=A)

David Mallory, P.E.  
Manager, Measures Development Section, Stationary Source Division  
California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

Re: Unreasonable 10% VOC Standards for Automotive Maintenance Products

Dear Mr. Mallory:

Bridgeview Aerosol, LLC is very concerned about the Air Resources Board's (ARB's) 10 % VOC emission standards for four automotive maintenance product categories in the proposed 2006 Amendments to California's Consumer Products Regulation.

The proposed 10% VOC standard for Brake Cleaners, Carburetor or Fuel-Injection Air Intake Cleaners, Engine Degreasers, and General Purpose Degreasers will destroy our ability to manufacture automotive maintenance products that are used to effectively clean and maintain vehicles.

Bridgeview Aerosol, LLC is a private label aerosol producer that manufactures products in all four of these categories for many customers that market and sell these items in California. The impact of these standards would negatively impact these businesses and their customers, i.e., automotive maintenance personnel, classic automobile enthusiasts, and anyone who owns or operates a motor vehicle in California. Proper vehicle maintenance is

essential to maintaining the safety of automobiles and the proper wear of automotive parts like brakes, carburetors, engines, and other components provides for this safety.

Specifically, Bridgeview Aerosol, LLC is concerned that the ARB has not considered the potential hazards that may be caused by residues on automotive brake parts or other vital automotive parts. We are also concerned that the proposed standards will increase costs to the automotive service industry and to consumers due to the additional time required for brake jobs and other degreasing operations as a result of the additional drying time required during cleaning and increased labor required because of less effective products. Bridgeview Aerosol, LLC is also concerned that the ARB has not considered benefits of effective engine maintenance in reducing automotive VOC, nitrogen oxide, and particulate matter air emissions. In addition, the ARB has not considered the inappropriateness of low-vapor pressure (LVP) ingredients used to reformulate these products and the negative impacts that oily residues present in air intake systems where soils from the air can build up and collect. The ARB has also failed to consider current limitations to carburetor cleaner formulations due to the U.S. EPA's required registration of fuel additives. Finally, Bridgeview Aerosol, LLC is seriously concerned that these 10% VOC standards will result in the elimination of these essential product categories and lead to the use of non-regulated solvents, like gasoline, in these applications. As the effectiveness of the cleaning products declines, end users will seek out other materials that will work for them in these applications.

We have been a member of the CARB Technical Advisory Committee on the IRTA study from its inception and we have continually voiced our concern regarding the infeasibility of the formulations that were regarded as "satisfactory" by IRTA. Our internal investigations of these products have not produced results that we believed would lead to marketable products. We had proposed that a standard methodology be used to evaluate the formulations. We have shown in presentations to staff that the results obtained from that methodology shows that the technical performance requirements were not being met. If the products do not meet performance requirements, then they certainly cannot and will not be commercially viable.

Our industry has reduced emissions from these products many times and has offered to make additional reductions. However the current proposed 10% VOC standards are not a reasonable compromise nor are the proposed limits technologically and commercially feasible. Therefore we strongly suggest that the ARB to withdraw the 10% VOC standards and propose a more reasonable regulatory limit that it will protect California's air quality without having such a severe negative impact on these vitally important automotive maintenance products.

Sincerely,

Edward S. Piszynski

Edward S. Piszynski  
Vice President  
Laboratory Services

cc: Andrew Hackman, ASPA  
D. Douglas Fratz, CSPA  
Joseph Yost, CSPA

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-11-01 10:01:39

No Duplicates.

## **Comment 54 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Richard

Last Name: Orcutt

Email Address: bluzzz@pacbell.net

Affiliation: Auto Technician/ Machinist

Subject: Cleaners and Degreasers

Comment:

Please do not reduce the effectiveness of cleaners and degreasers. They are already less effective than they were ten years ago and that causes more time to be spent trying to clean parts. Time is money as the saying goes and that all gets passed on to the consumer. What will we do when we can no longer clean parts? I understand about keeping the air clean and that is important to me as well. Keeping cars and trucks tuned and running smoothly so they get good mileage with low emissions as possible is what technicians across the country are trying to do. Even more so here in California. Reducing the effectiveness of cleaners and degreasers even further will limit the the technicians ability to do their work. Please don't cripple our businesses in an attempt to get the chemical companies produce a product that is safe and will actually work.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-11-01 17:42:46

No Duplicates.

## **Comment 55 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Sean

Last Name: McNear

Email Address: sean.mcnear@honeywell.com

Affiliation: Honeywell

Subject: Comments on Sept. 29, 2006 Proposed Consumer Products Regulation

Comment:

Please find my comments attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/65-carb\_comments\_final\_to\_record.pdf'

Original File Name: Carb Comments final to record.pdf

Date and Time Comment Was Submitted: 2006-11-02 13:07:02

No Duplicates.

## **Comment 56 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Dan

Last Name: Fogle

Email Address: bob@foresthillauto.com

Affiliation: Automotive Service Councils of CA

Subject: Letter Regarding VOC Regulations

Comment:

Please see the attached comment letter.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/66-cpwg2006-56.pdf'

Original File Name: cpwg2006-56.pdf

Date and Time Comment Was Submitted: 2006-11-02 14:45:43

No Duplicates.

## **Comment 57 for Consumer Products (cpwg2006) - 45 Day.**

First Name: James

Last Name: Heidel

Email Address: JHeidel@turtlewax.com

Affiliation: Turtle Wax, Inc.

Subject: Definition of Vinyl and Rubber Protectants

Comment:

Please see the attached comment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/67-cpwg2006-57.pdf'

Original File Name: cpwg2006-57.pdf

Date and Time Comment Was Submitted: 2006-11-02 14:47:59

No Duplicates.



## **Comment 58 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Steve

Last Name: Cook

Email Address: Cook@techspray.com

Affiliation:

Subject: Proposed amendments to the CA Consumer Products

Comment:

I have attached my comments.

Thanks Steve

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/68-clerk\_of\_the\_board\_carb\_11-3-06.doc'

Original File Name: Clerk of the Board CARB 11-3-06.doc

Date and Time Comment Was Submitted: 2006-11-03 13:07:41

No Duplicates.

## **Comment 59 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Larry

Last Name: Beaver

Email Address: Lbeaver@gunk.com

Affiliation: Radiator Specialty Company

Subject: Proposed Amendments to CA Consumer Products Reg

Comment:

Please open the attached document to view our detailed comments regarding the Proposed Amendments to the California Consumer Products Regulations.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/69-comments\_re\_arb\_staff\_proposal\_b.doc'

Original File Name: Comments re ARB staff proposal\_b.doc

Date and Time Comment Was Submitted: 2006-11-03 13:25:11

No Duplicates.

## **Comment 60 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Katy

Last Name: Wolf

Email Address: Non-web submitted comment

Affiliation: Institute for Research & Technical Asst.

Subject: Support of Consumer Products Proposal for November 16-17 Pulic Hearing

Comment:

Please see the attached comment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/70-cpwg2006-60.pdf'

Original File Name: cpwg2006-60.pdf

Date and Time Comment Was Submitted: 2006-11-06 09:16:38

No Duplicates.

## **Comment 61 for Consumer Products (cpwg2006) - 45 Day.**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

## **Comment 62 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Jim

Last Name: McCabe

Email Address: Non-web submitted comment

Affiliation: The Clorox Co.

Subject: Consumer Products Rule: Rubber/Vinyl Protectant Category

Comment:

Please see the attached comment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/72-cpwg200-62.pdf'

Original File Name: cpwg200-62.pdf

Date and Time Comment Was Submitted: 2006-11-07 10:56:52

No Duplicates.

## **Comment 63 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Henry

Last Name: Buchanan

Email Address: Non-web submitted comment

Affiliation: Sunnyside Corp.

Subject: CA Consumer Products Regulation

Comment:

Please see the attached comment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/73-cpwg2006-63.pdf'

Original File Name: cpwg2006-63.pdf

Date and Time Comment Was Submitted: 2006-11-07 10:58:19

No Duplicates.

## **Comment 64 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Mel  
Last Name: Zeldin  
Email Address: mel@capcoa.org  
Affiliation: CAPCOA

Subject: CAPCOA Comment Letter  
Comment:

CAPCOA comment letter attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/74-11-7-06\_letter\_to\_arb\_on\_cons\_prod.pdf'

Original File Name: 11-7-06 Letter to ARB on Cons Prod.pdf

Date and Time Comment Was Submitted: 2006-11-07 12:09:59

No Duplicates.

## **Comment 65 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Catherine  
Last Name: Jacobson  
Email Address: cfjacobson@mmm.com  
Affiliation: 3M

Subject: Comments on the Proposed Amendments to the California Consumer Products Regulation

Comment:

Attached please find 3M's comments on the Proposed Amendments to the California Consumer Products Regulation and the Aerosol Coatings Regulation, dated September 29, 2006. If you have any questions, please let me know. Thank you.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/75-3m\_comments\_on\_cons2\_7nov2006.pdf'

Original File Name: 3M comments on CONS2 7nov2006.pdf

Date and Time Comment Was Submitted: 2006-11-07 14:49:11

No Duplicates.



## **Comment 66 for Consumer Products (cpwg2006) - 45 Day.**

First Name: David  
Last Name: Ferguson  
Email Address: dferguson@agcchem.com  
Affiliation: AGC Chemicals Americas, Inc

Subject: Support for change in Electronic Cleaner Definition  
Comment:

AGC Chemicals Americas, Inc.

November 09, 2006

Clerk of the Board  
Air Resources Board  
1001 I Street  
P.O. Box 2815  
Sacramento, California 95812

Subject: Electronic Cleaner Definition

Dear Clerk of the Board,

AGC is a \$14 Billion dollar manufacturer of commodity and specialty compounds employing 65,000 people at factories across the United States and abroad. We have been in business for 100 years and have a strong commitment to our employees, our community, and our environment.

One of our specialty compounds is used in the electronic industry and falls within the guidelines of the substances that you are evaluating. We are limiting our comments to the Electronic Cleaner proposed definition change. AGC is in support of this proposed definition change. Furthermore, AGC is requesting that products used in the aviation maintenance and on energized components also be included into the exemption in the definition. These additional uses were uses for the compound HCFC 141b, which has been phased out of production. AGC respectfully requests that these two other uses be incorporated into the definition. We appreciate the opportunity to comment on this important issue.

Thank you for your time and consideration to this issue.

Respectfully,

David Ferguson  
AGC Chemicals Americas, Inc.  
229 E. 22nd Street  
Bayonne, NJ 07002-5002

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-11-09 13:19:38

No Duplicates.

## **Comment 67 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Denise

Last Name: Boyd

Email Address: denise.boyd@permatex.com

Affiliation: Permatex

Subject: Rubber & Vinyl Protectants

Comment:

Permatex is a manufacturer and distributor of specialty automotive maintenance and repair products, including tire care products. While the relationship between this product category's inclusion in the Consumer Products rule and the Aerosol Coatings rule is not totally clear, it has been our understanding that these products would be regulated by the former. Accordingly, we have reformulated these products to meet the 10% limit. Permatex does not believe that we are the only manufacturer that has taken this interpretation.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-11-10 06:47:42

No Duplicates.

## **Comment 68 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Sue

Last Name: Max

Email Address: [smax@chemtronics.com](mailto:smax@chemtronics.com)

Affiliation: ITW Chemtronics

Subject: Electronic Cleaner Definition

Comment:

Comments related to the Electronic Cleaner Definition of the Proposed Amendments to the California Consumer Products regulations are attached.

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/78-chemtronics\\_11-10-06a.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/78-chemtronics_11-10-06a.pdf)'

Original File Name: Chemtronics 11-10-06a.pdf

Date and Time Comment Was Submitted: 2006-11-10 10:53:49

No Duplicates.

## **Comment 69 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Robin

Last Name: Bedell-Waite

Email Address: rbwaite@hsd.cccounty.us

Affiliation: Contra Costa Hazardous Materials

Subject: Proposed Amendmts for Aerosol Coating Products

Comment:

I am writing in support of the proposed amendments to lower the VOC content in aerosol coatings products. Here is my experience as staff in a CUPA as well as the program manager for the Contra Costa Green Business Program:

1. Many shops are phasing out aerosols completely, finding adequate substitutes (particularly water-based brake cleaning).
2. Industry says this can't be done, the regulation passes, and then industry makes it happen.
3. IRTA, headed up by Katy Wolf, does impeccable research. They are practical, working with shops directly to identify possible, EFFECTIVE alternatives. They have done their homework and have found that the lower VOC alternatives work.

If there are practical, effective alternatives that have already been proven, why wouldn't we go ahead and lower the allowable VOC levels according to staff proposed amendments??? I support the proposed amendments.

Robin Bedell-Waite  
Green Business Program Coordinator

Support: Amendments Lowering VOC Content in Aerosol Coatings

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-11-13 08:54:13

No Duplicates.

## **Comment 70 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Jennifer

Last Name: Counts

Email Address: Counts.JL@pg.com

Affiliation:

Subject: Comments on Sanitizers / Disinfectants

Comment:

We are concerned that the potential exists for the Most Restrictive Limit to apply the more stringent proposed VOC limit of 1% for Sanitizers or Disinfectants to products already regulated by other VOC limits.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/80-carb\_comments\_sanitizersdisinf\_nov\_13\_2006.doc'

Original File Name: CARB Comments SanitizersDisinf Nov 13 2006.doc

Date and Time Comment Was Submitted: 2006-11-13 10:29:08

No Duplicates.

## **Comment 71 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Joel  
Last Name: Ervice  
Email Address: joel@rampasthma.org  
Affiliation: Community Action to Fight Asthma (CAFA)

Subject: Support for Proposed Amendments  
Comment:

November 13, 2006

California Air Resources Board  
Headquarters Building  
1001 "I" Street  
P.O. Box 2815  
Sacramento, CA 95812

RE: Support for Proposed Amendments to the Consumer Products  
Regulation and the Aerosol Coatings Regulation

Community Action to Fight Asthma (CAFA), a statewide network of asthma coalitions working to reduce environmental triggers of asthma for school aged children, urges the California Air Resources Board to support amendments to the Consumer Products Regulation and the Aerosol Coatings Regulation. These amendments will set forth new Volatile Organic Compound (VOC) limits which will achieve a 10.6 tons per day VOC emission reduction statewide by 2008 and an 11.5 tons per day reduction by 2010. These reductions will result in continued progress in achieving state and federal ambient air quality standards and improving health for California residents.

One of CAFAs priorities is to improve indoor air quality since adults and children, on average, spend 90% of their time during the week indoors. The majority of this time is spent in the home where individuals can be exposed to many uncontrolled environmental triggers, including VOCs, which can cause irritation to the lungs and can lead to asthma, allergies and other health threatening conditions. Children also spend much of their day in school classrooms, which can impose additional exposure to indoor air pollutants. Current reports indicate that one in ten school-age children suffer from asthma symptoms.

Recent studies throughout California found there were high air concentrations of formaldehyde and VOCs in some traditional and portable school classrooms due to various indoor sources and/or poor ventilation. VOCs are respiratory irritants emitted into the air by building and interior finish materials, furnishings, and cleaning and teaching products. These indoor air pollutants can trigger asthma attacks and have an effect on student and staff health, academic achievement, and absenteeism. Identifying these triggers and working to eliminate them can help reduce the frequency and intensity of asthma attacks and provide a healthier

learning environment for students and staff.

Of the many asthma triggers in the environment, air pollution is one of the few that can be influenced by policies and regulations.

The Amendments to the Consumer Products Regulation and the Aerosol Coatings Regulation would achieve VOC emission reductions overall, which would have an impact on improving indoor air quality and reducing asthma triggers. These improvements directly impact the health of many who work to manage their asthma on a daily basis.

Asthma coalitions throughout the state, as part of the CAFA Network, are working to improve both indoor and outdoor air quality. In some communities, for example, coalitions are working to implement and enforce indoor and outdoor air quality asthma policies and programs in schools while others are building awareness of air quality problems through inventive community collaborations and partnerships. Regardless of the particular approach, however, coalitions recognize that they can't fix the air quality problem on their own, and that appropriate regulations must be in place to protect the public's health - particularly the health of children. Amendments to the Consumer Products Regulation and the Aerosol Coatings Regulation will go a long way to providing much needed assistance to working toward a solution.

Thank you for your time and consideration. Please feel free to contact me at 510-302-3316 with any questions or concerns.

Sincerely,

Joel Ervice  
Associate Director  
Regional Asthma Management and Prevention (RAMP) Initiative  
Statewide Coordinator of Community Action to Fight Asthma (CAFA)

Attachment: "

Original File Name: Support letter - ARB.doc

Date and Time Comment Was Submitted: 2006-11-13 12:09:33

No Duplicates.



## **Comment 72 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Catherine

Last Name: Porter

Email Address: cporter@worksafe-cosh.org

Affiliation: WorkSafe

Subject: Nov 17 hearing--Consumer Products regulation amendments

Comment:

Letter attached supporting VOC limits for auto aerosol cleaning products at 10%.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/84-arb\_ltr\_re\_voc\_levels\_11-06.doc'

Original File Name: arb ltr re voc levels 11-06.doc

Date and Time Comment Was Submitted: 2006-11-13 12:39:59

No Duplicates.

## **Comment 73 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Steve

Last Name: Gaver

Email Address: sgaver@sem.ws

Affiliation: SEM Products, Inc.

Subject: Comment on Rubber/Vinyl Protectant

Comment:

Please note attached comment on the proposed rubber/vinyl protectant definition change. If there is any problem downloading this message or there are any questions, please contact me at 704 716 8541

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/85-sem\_comment\_vinyl\_protectant\_14nov06.doc'

Original File Name: SEM comment vinyl protectant 14nov06.doc

Date and Time Comment Was Submitted: 2006-11-14 04:45:56

No Duplicates.

## **Comment 74 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Elizabeth

Last Name: Anderson

Email Address: andersone@ctfa.org

Affiliation: CTFA

Subject: Board Agenda Item 06-10-8

Comment:

Attached please find comments from CTFA on the Proposed Amendments to the California Consumer Products Regulation. Please contact our office at 202-331-1770 x495 if you have any questions or concerns. Thank you.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/86-carb\_comments111406.pdf'

Original File Name: CARB Comments111406.pdf

Date and Time Comment Was Submitted: 2006-11-14 08:29:24

No Duplicates.

## **Comment 75 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Robert  
Last Name: Israel  
Email Address: Robert.Israel@johnsondiversesey.com  
Affiliation:

Subject: Comments on Floor Polish/Wax VOC Limits  
Comment:

JohnsonDiversesey, Inc.  
Global Headquarters  
8310 16th St.  
Sturtevant, WI 53177

Tel: 262 631 4001

November 13, 2006

Clerk of the Board  
Air Resources Board  
1001 I Street, 23rd Floor  
Sacramento, California 95814

Electronic submittal:  
<http://www.arb.ca.gov/lispub/comm/bclist.php>

Robert F. Sawyer, Ph.D, Chair  
Air Resources Board  
1001 I Street  
Sacramento, California 95814

Subject: Floor polish or wax VOC limits

Dear Dr. Sawyer:

Staff is proposing a 1% VOC limit for all floor polishes and waxes which represents a major reduction from the current limits of 7% VOC for flexible flooring and 10% VOC for non-resilient flooring. Johnson Diversesey, Inc, is willing to accept the staff proposal for the vast majority of floor polish/wax applications. We however, request that you direct staff to continue to work with us to develop an appropriate mechanism to provide for specialized commercial floor polishes at the 3% VOC level that, in use, will emit no more VOCs than products meeting the 1% staff proposed limit. These very specialized products last at least three times longer between applications than a typical 1% VOC product.

About JohnsonDiversesey, Inc.

JohnsonDiversesey (JD) is a market leader in the floor wax/polish category, representing twenty percent of the market, predominantly in the premiere performance product market. JD is larger than the next eight companies combined in floor polish/wax products. No

other company has the prominence, expertise and knowledge that JD has in this product category and we view ourselves as the cutting edge/quality leader. An enormous amount of research and development goes into creating these products. We are also deeply committed to environmental sustainability as reflected by our corporate heritage and our industry leading Healthy High Performance Cleaning program, participation in the US Green Building Council's green building program, LEED, green product certifications with Green Seal, and many others.

#### JohnsonDiversey has Worked with Staff on a 3% Subcategory

JD understands and appreciates the challenge faced by the ARB and the need for emission reductions from any and all possible sources. However, we strongly believe that products specifically designed to require burnishing as part of prescribed and required maintenance are deserving of a subcategory within the resilient floor polish/wax category. In communications with ARB Staff, we have defined this category of floor polishes, specifically designed to require burnishing as part of prescribed and required maintenance, as the 'must burnish' products. Burnishing resilient floor polish/wax products is recognized as a common industry practice for these products in order to extend service life between product reapplication. From an emissions perspective, the justification for this 3% VOC subdivision is specifically designed performance characteristics that make "must-burnish" products last at least three times longer between applications when compared to 1% VOC products that do not respond to burnishing.

We have worked extensively with Staff to develop a 3% subcategory for this group of products. JD remains convinced that products, which average about 3% VOC, meet very specific needs in the marketplace for maintaining acceptable appearance, adequate flooring protection, and minimizing business interruption through reduced reapplication requirements while maintaining a safe surface for the public to walk on. These characteristics are especially critical in healthcare, hospitality, retail and government facilities which tend to be "24 hour" in open operation. Application of floor finishes requires multiple coats to be applied with time to dry between coats, disrupting business activity in that area of the facility. The application process is also very labor intensive. Loss of these extended service life "must-burnish" products from the marketplace would have a negative economic impact on these businesses and government facilities through increased labor costs and business interruption.

Once applied, these products only need periodic burnishing with a high speed mechanical buffing machine to repair and restore the existing floor polish appearance. Further, we also believe that in-use emissions from usage of these 'must burnish' 3% VOC products will be no greater and likely less than in-use emissions from 1% VOC products. This is because of the reduced number of applications of product and the reduction in the use of VOC containing chemical strippers used to remove existing finishes before installations.

We also want to note that even with a 3% subcategory, JD will need to reformulate a significant number of products and likely will incur expense of millions of dollars. Without the subcategory, the expense is not expected to be significantly higher.

We believe staff understands industry's assertions that a 3% sub-category has merit and we also believe that staff has worked with us to try to develop the appropriate definitive criteria for such a sub-category. Unfortunately, we have, to date, been unsuccessful in our quest.

#### Conclusion

Due to our inability to date to identify an enforceable set of defining criteria for the subcategory, and faced with a tight time frame, JD will not oppose the current staff proposal of a 1% VOC limit across the product category. We also commit to investigating with staff all other possible options for compliance including the Innovative Product Exemption and the Alternative Compliance Plan available under current ARB regulation. Finally, we respectfully request that the Board and staff be willing to revisit the creation of a subcategory in the future if an adequate definition can be developed.

JD would again like to acknowledge the willingness of your staff to work with us on this issue. They have granted us every meeting we requested and have been professional through each step of the process. Staff has indicated their continued willingness to work with us on this issue and all the compliance options available. JD has already devoted considerable resources evaluating the feasibility of a 1% VOC limit and the effort required for reformulation of their floor wax/polish products and will continue our focus in this area in light of these regulations.

Sincerely,

Robert J. Israel, Ph.D.  
Director, Corporate Product Responsibility

cc: Honorable Members, Air Resources Board

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-11-14 08:41:33

No Duplicates.

## **Comment 76 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Bruce  
Last Name: Douglass  
Email Address: bruce@fastundercar.com  
Affiliation: Fast Undercar

Subject: Proposed 10% VOC standard for Brake Cleaners  
Comment:

Fast Undercar and its customers are very concerned about the VOC emission standards for four automotive maintenance product categories in the proposed CONS-2 regulation.

The proposed 10% VOC standard for Brake Cleaners, Carburetor or Fuel-Injection Air Intake Cleaners, Engine Degreasers, and General Purpose Degreasers could have a negative impact on consumers from increase costs since less effective products will require more time for routine auto maintenance. We are also concerned that ARB has not fully considered the impact of these standards and has not conducted significant long-term testing to ensure that the resulting products will not endanger vehicle safety or consumer preferences.

We understand that the automotive product industry has already reduced emissions from these products and has offered to make additional reductions. We are asking ARB to reconsider its 10% VOC standards and consider a compromise that will protect California's air quality without having a negative impact on our members' ability to provide quality vehicle maintenance.

Sincerely,  
Bruce Douglass, President and CEO

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2006-11-14 08:45:46

No Duplicates.

## **Comment 77 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Phil

Last Name: Bobel

Email Address: phil.bobel@cityofpaloalto.org

Affiliation: Palo Alto Regional Water Quality Control

Subject: Comments on the November 2006 Proposed Amendments to the California Consumer Products Reg

Comment:

Please see the attached message.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/89-arb\_consumer\_products\_reg\_nov\_2006\_comments.doc'

Original File Name: ARB Consumer Products Reg\_Nov 2006 Comments.doc

Date and Time Comment Was Submitted: 2006-11-14 11:00:27

No Duplicates.



## **Comment 78 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Herbert  
Last Name: Estreicher  
Email Address: [estreicher@khlaw.com](mailto:estreicher@khlaw.com)  
Affiliation: Keller and Heckman LLP

Subject: Comments on the Proposed 2006 Amendments to the CA Consumer Products Regs.  
Comment:

Please see the attached comment.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/90-cpwg06-77.pdf>'

Original File Name: cpwg06-77.pdf

Date and Time Comment Was Submitted: 2006-11-14 12:17:33

No Duplicates.

## **Comment 79 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Kevin

Last Name: Reilly

Email Address: Kreilly@dhs.ca.gov

Affiliation:

Subject: regulations to reduce volatile organic compounds

Comment:

Summary of CDHS recommendations regarding proposed rulemaking on emission limits for categories of disinfectants, toners, and astringents.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/91-arb\_rulemaking\_on\_vocs\_-\_9-26-1\_djm\_modifications2.doc'

Original File Name: ARB rulemaking on VOCs - 9-26-1 DJM modifications2.doc

Date and Time Comment Was Submitted: 2006-11-14 12:43:09

No Duplicates.

## **Comment 80 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Heidi

Last Name: McAuliffe

Email Address: hmcauliffe@paint.org

Affiliation: National Paint & Coatings Ass.

Subject: Consumer Products - Rubber and Vinyl Protectant category

Comment:

Please accept the attached comments from National Paint & Coatings Association, Inc's Spray Paint Manufacturers Committee regarding the Rubber/Vinyl Protectant category. Thank you for your consideration.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/92-npca\_cons2\_comments.pdf'

Original File Name: npca\_cons2\_comments.pdf

Date and Time Comment Was Submitted: 2006-11-14 13:10:01

No Duplicates.

## **Comment 81 for Consumer Products (cpwg2006) - 45 Day.**

First Name: D. Douglas  
Last Name: Fratz  
Email Address: dfratz@cspa.org  
Affiliation: CSPA

Subject: CSPA Comments on Consumer Products Proposal  
Comment:

Please see the attached comment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/95-cspa\_comments.zip'

Original File Name: CSPA Comments.zip

Date and Time Comment Was Submitted: 2006-11-14 14:02:30

No Duplicates.

## **Comment 82 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Henry

Last Name: Buchanan

Email Address: Non-web submitted comment

Affiliation: Sunnyside Corp.

Subject: Comments on Consumer Products Regulations

Comment:

Please see the attached comment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/96-cpwg2006-82.pdf'

Original File Name: cpwg2006-82.pdf

Date and Time Comment Was Submitted: 2006-11-14 14:05:21

No Duplicates.

## **Comment 83 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Andrew

Last Name: Hackman

Email Address: ahackman@cspa.org

Affiliation:

Subject: ASPA's Supplemental Comments on ARB's Proposed 2006 Amendments to the California Consumer

Comment:

Attached please find the Automotive Specialty Products Alliance's (ASPA) supplemental comments on the proposed 2006 Amendments to the California Consumer Products Regulation and the Aerosol Coatings Regulation.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/97-aspa\_supplemental\_comments\_on\_arb\_proposed\_cons\_\_prod\_\_rule.pdf'

Original File Name: ASPA Supplemental Comments on ARB Proposed Cons Prod Rule.pdf

Date and Time Comment Was Submitted: 2006-11-14 14:08:31

No Duplicates.

## **Comment 84 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Heidi

Last Name: McAuliffe

Email Address: hmcauliffe@paint.org

Affiliation: NPCA

Subject: Consumer Products - Construction Adhesives

Comment:

Please accept the attached comments on the Consumer Products proposed amendments. If you have any questions, do not hesitate to contact me.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/98-npca\_cons2\_comments2\_\_2\_.pdf'

Original File Name: npca\_cons2\_comments2 (2).pdf

Date and Time Comment Was Submitted: 2006-11-15 05:57:20

No Duplicates.

## **Comment 85 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Dan

Last Name: Askey

Email Address: dmallory@arb.ca.gov

Affiliation:

Subject: Concern about VOC emissions standards

Comment:

See attached letter

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/99-dan\_askey\_nov\_9\_consumer\_products.pdf'

Original File Name: Dan Askey Nov 9 Consumer Products.pdf

Date and Time Comment Was Submitted: 2006-11-15 09:45:35

No Duplicates.



## **Comment 86 for Consumer Products (cpwg2006) - 45 Day.**

First Name: David

Last Name: Shaw

Email Address: sj7430@bellsouth.net

Affiliation: National Aerosol Association

Subject: Consumer Products Amendments for Board Hearing

Comment:

Please accept comments on behalf of the National Aerosol Association

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/100-clerkoftheboardnaa.doc'

Original File Name: ClerkoftheBoardNAA.doc

Date and Time Comment Was Submitted: 2006-11-15 11:59:45

No Duplicates.

## **Comment 87 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Jonathan

Last Name: Morrison

Email Address: jmorrison@cmcda.org

Affiliation: California Motor Car Dealers Association

Subject: Consumer Product Regulatory Amendment Comments

Comment:

Please find attached the comments of the California Motor Car Dealers Association.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/101-voc\_letter.doc'

Original File Name: VOC Letter.doc

Date and Time Comment Was Submitted: 2006-11-15 12:49:36

No Duplicates.

## **Comment 88 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Paul

Last Name: Martyn

Email Address: Non-web submitted comment

Affiliation: County Sanitation Districts of LA County

Subject: Comments on November 2006 Proposed Amendment to CA Consumer Products Regulations

Comment:

Please see the attached comment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/102-scan.pdf'

Original File Name: scan.pdf

Date and Time Comment Was Submitted: 2006-11-15 14:05:00

No Duplicates.

## **Comment 89 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Phil

Last Name: Bobel

Email Address: Non-web submitted comment

Affiliation: Regional Water Quality Control Plant

Subject: Comments on the Nov. 2006 Proposed Amendments to the CA Consumer Products Reg.  
Comment:

Please see the attached comment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/109-cpwg2006-89.pdf'

Original File Name: cpwg2006-89.pdf

Date and Time Comment Was Submitted: 2006-11-21 15:25:34

No Duplicates.

## **Comment 90 for Consumer Products (cpwg2006) - 45 Day.**

First Name: Mahin

Last Name: Talebi

Email Address: Non-web submitted comment

Affiliation: Orange Co. Sanitation District

Subject: Comments on the Nov.1006 Proposed Amendments to the CA Consumer Products Reg.  
Comment:

Please see the attached comment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/110-cpwg2006-90.pdf'

Original File Name: cpwg2006-90.pdf

Date and Time Comment Was Submitted: 2006-11-21 15:27:55

No Duplicates.

## **Comment 1 for Consumer Products (cpwg2006). (At Hearing)**

First Name: Eileen

Last Name: Sottile

Email Address: esgart@bellsouth.net

Affiliation: Keystone Automotive Industries, Inc.

Subject: Memorandum Opposing the Cons-2 Regulation

Comment:

Please see the attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/103-cpwg2006-ws-1.pdf>

Original File Name: cpwg2006-ws-1.pdf

Date and Time Comment Was Submitted: 2006-11-21 11:10:15

No Duplicates.

## **Comment 2 for Consumer Products (cpwg2006). (At Hearing)**

First Name: Tim

Last Name: Carmichael

Email Address: Non-web submitted comment

Affiliation: Coalition for Clean Air

Subject: VOC Limits for Consumer Products Regulation

Comment:

Please see the attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/104-cpwg2006-ws-2.pdf>

Original File Name: cpwg2006-ws-2.pdf

Date and Time Comment Was Submitted: 2006-11-21 11:17:48

No Duplicates.

### **Comment 3 for Consumer Products (cpwg2006). (At Hearing)**

First Name: Barry

Last Name: Wallerstein

Email Address: Non-web submitted comment

Affiliation: SCAQMD

Subject: Rulemaking to Consider Adoption of Proposed Amendments to the CA Consumer Products Reg.

Comment:

Please see the attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/105-cpwg2006-ws-3.pdf>

Original File Name: cpwg2006-ws-3.pdf

Date and Time Comment Was Submitted: 2006-11-21 11:19:34

No Duplicates.



## **Comment 4 for Consumer Products (cpwg2006). (At Hearing)**

First Name: Virginia

Last Name: St. Jean

Email Address: Non-web submitted comment

Affiliation: SF City & Co. Dept. of Public Health

Subject: Support of Consumer Products Proposal for the Reduction of VOC limits for automotive...

Comment:

Please see the attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/106-cpwg2006-ws-4.pdf>

Original File Name: cpwg2006-ws-4.pdf

Date and Time Comment Was Submitted: 2006-11-21 11:21:58

No Duplicates.

## **Comment 5 for Consumer Products (cpwg2006). (At Hearing)**

First Name: Lee

Last Name: Lockie

Email Address: Non-web submitted comment

Affiliation: SCAQMD

Subject: Public Hearing to Consider Proposed Amendments to the CA Consumer Products Reg.  
Comment:

Please see the attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/107-cpwg2006-ws-5.pdf>

Original File Name: cpwg2006-ws-5.pdf

Date and Time Comment Was Submitted: 2006-11-21 11:23:23

No Duplicates.

## **Comment 6 for Consumer Products (cpwg2006). (At Hearing)**

First Name: Elaine

Last Name: Chang

Email Address: Non-web submitted comment

Affiliation: SCAQMD

Subject: Public Hearing to Consider Proposed Amendments to the CA Consumer Products Reg.  
Comment:

Please see the attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/108-cpwg2006-ws-6.pdf>

Original File Name: cpwg2006-ws-6.pdf

Date and Time Comment Was Submitted: 2006-11-21 11:24:14

No Duplicates.

## **Comment 1 for Consumer Products (cpwg2006) - 15-1.**

First Name: Cristina

Last Name: Griffin

Email Address: Non-web submitted comment

Affiliation: Delta Anayltical Corp.

Subject: Proposed Amendments to the CA Consumer Products Regs.

Comment:

Please see the attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/111-cpwg2006-15day-1.pdf>

Original File Name: cpwg2006-15day-1.pdf

Date and Time Comment Was Submitted: 2007-07-24 12:54:38

No Duplicates.

## **Comment 2 for Consumer Products (cpwg2006) - 15-1.**

First Name: Douglas

Last Name: Fratz

Email Address: dfratz@cspa.org

Affiliation: Consumer Specialty Products Association

Subject: 15-Day Notice

Comment:

CSPA appreciates the opportunity to offer comment on these important proposed regulatory changes to the California Consumer Products Regulation.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/113-cspa\\_comments\\_on\\_arb\\_15-day\\_modified\\_text.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/113-cspa_comments_on_arb_15-day_modified_text.pdf)

Original File Name: CSPA Comments on ARB 15-Day Modified Text.pdf

Date and Time Comment Was Submitted: 2007-07-24 13:14:08

No Duplicates.

## **Comment 3 for Consumer Products (cpwg2006) - 15-1.**

First Name: Martin

Last Name: Ledwitz

Email Address: martin.ledwitz@sce.com

Affiliation: Southern California Edison

Subject: California Consumer Products Regulation

Comment:

Request for CARB action.

Southern California Edison Company is concerned that your current Consumer Product Regulation is severely limiting, or denying, our ability to provide safe electrical service to our customers. Our workers must use clean non-conducting tools to work on energized and non-energized (at that time) electrical equipment. The tools and electrical equipment need to be clean, dry, and without residue after the cleaning process. There is a real need for limited use of denatured alcohol. Since you have opened the Consumer Product Regulation, we believe this is the time for regulatory relief.

Denatured alcohol, at this time, is the only solvent we have available for use in cleaning electrical equipment and the cleaning of tools etc. used in the repair and maintenance of our electrical equipment. SCE can use the product we have on hand, in aerosol format, for a limited use through period according to Title 17. We request an exemption be put into the CARB regulations similar to the one in SCAQMD Rule 1171. The CARB restriction on the use of solvents less than 45% VOC by weight for Electrical Cleaning in Title 17 is detrimental and unsafe for our employees. The exemption that is requested would be based on SCAQMD Rule 1171 (h) (4):

We suggest it should read:

"Cleaning with aerosol products shall not be subject to the 45% VOC by weight restriction if 160 fluid ounces or less of non-compliant aerosol products are used per day, per facility."

Denatured alcohol is needed for the cleaning of our electrical apparatus because it does not damage electrical component insulation systems, it displaces/eliminates and does not add moisture which can cause the insulation systems to fail, and it does not leave a residue which can cause high voltage electrical tracking which leads to equipment failure. We do not have a substitute clean up with these features.

Continuity of electricity supply, and minimization of electric equipment failure, is too critical to the economy of California, compared to the marginal air quality benefit to be obtained from elimination of the VOCs from denatured alcohol used in critical cleaning of the utility infrastructure.

At this time there is a serious conflict between the definitions

of VOC, the regulations, and exemptions between CARB and the local air districts. Most of our concern is in the SCAQMD, although we operate in nine districts across the state. We also are having trouble with manufacturers of VOC solvent and coating compounds in getting them to design and provide usable compliant product. California utilities make up a small share of the market and we do not have leverage to force research and production of the coatings and solvents needed peculiar to our industry.

We therefore request that CARB include in your VOC definition all of the "exempt compounds" found in the SCAQMD Rule 102 VOC definition? This would hopefully allow manufacturers to produce more low VOC compliant "green" chemical products for the California market without the current conflicting regulations at the state/local levels.

Please contact me if you desire additional information.

Martin W. Ledwitz  
Manager, Air Quality  
Southern California Edison

Phone: 626-302-9538  
FAX: 626-302-9130  
e-mail: martin.ledwitz@sce.com

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2007-07-30 09:34:03

No Duplicates.

## **Comment 4 for Consumer Products (cpwg2006) - 15-1.**

First Name: William

Last Name: Chase, II

Email Address: Non-web submitted comment

Affiliation: McLaughlin Gormley King Co.

Subject: CA Consumer Products Regulation

Comment:

Please see the attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/cpwg2006/115-cpwg2006.pdf>

Original File Name: cpwg2006.pdf

Date and Time Comment Was Submitted: 2007-08-30 14:21:31

No Duplicates.