

Comment 1 for Small Containers of Automotive Refrigerant (smallcans2016) - 45 Day.

First Name: Aaron

Last Name: Lowe

Email Address: aaron.lowe@autocare.org

Affiliation: Auto Care Association

Subject: Re: Proposed Amendments to the Regulation for Small Containers of Automotive Refrigerant

Comment:

Please see attachment.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/3-smallcans2016-VTZTNFwvU2JQCVAz.pdf>'

Original File Name: CARB Comments_Small Containers_Apr2016_wAttached.pdf

Date and Time Comment Was Submitted: 2016-04-18 12:02:10

No Duplicates.

Comment 2 for Small Containers of Automotive Refrigerant (smallcans2016) - 45 Day.

First Name: Environmental

Last Name: Investigation Agency

Email Address: cstarr@eia-global.org

Affiliation: Environmental Investigation Agency

Subject: EIA Comments on Proposed Amendments

Comment:

Please find attached the comments of the Environmental Investigation Agency in support of the proposed amendments to the Regulation for Small Containers of Automotive Refrigerant.

Thank you for this opportunity to comment.

Best regards,
EIA

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/4-smallcans2016-Wz5QPwFhBQIVMFM8.pdf>'

Original File Name: EIA Comments _ARB_Automotive Small Cans Regulation_April 18 2016.pdf

Date and Time Comment Was Submitted: 2016-04-18 14:22:43

No Duplicates.

Comment 3 for Small Containers of Automotive Refrigerant (smallcans2016) - 45 Day.

First Name: Christine
Last Name: Flowers
Email Address: christine@calpsc.org
Affiliation: California Product Stewardship Council

Subject: RE: Support Proposed Amendments to Small Container Regulations
Comment:

Please accept the attached letter signed by five the organizations listed below in support of the proposed amendments:

Christine Flowers, Assistant Director, California Product Stewardship Council

Jen Jackson, Toxics Reduction & Healthy Ecosystems Programs Manager, San Francisco Department of the Environment

Debra Kaufman, Senior Program Manager, StopWaste

Teresa Bui, Legislative and Policy Analyst, Californians Against Waste

Bill Magavern, Policy Director, Coalition for Clean Air

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/5-smallcans2016-UDFUIFU2VloGcMoD.pdf>'

Original File Name: ARB Sign-on Letter Final 4-18-16 Revised.pdf

Date and Time Comment Was Submitted: 2016-04-18 15:12:57

No Duplicates.

**Comment 1 for Small Containers of Automotive Refrigerant (smallcans2016).
(At Hearing)**

First Name: Elaine

Last Name: Schley

Email Address: Non-web submitted comment

Affiliation: Spectrum Brands

Subject: Comments on Proposed Amendments to the Reg for Small Containers of Auto
Refrigerant

Comment:

See attachment

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/6-smallcans2016-U2IHN1F9VDNQe1Bj.pdf>

Original File Name: 16-4-3 Elaine Schley.pdf

Date and Time Comment Was Submitted: 2016-04-22 14:46:48

No Duplicates.

Comment 1 for Small Containers of Automotive Refrigerant (smallcans2016) - 15-1.

First Name: Aaron

Last Name: Lowe

Email Address: aaron.lowe@autocare.org

Affiliation: Auto Care Association

Subject: Proposed Amendments to the Small Containers of Automotive Refrigerant Regulation

Comment:

Comments from Auto Care Association, California Automotive Wholesalers Association, and Coalition for Auto Repair Equality

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/7-smallcans2016-VTZdOgNwV2YBWA5.pdf>

Original File Name: CARB 15-Day Comments 9 12 16.pdf

Date and Time Comment Was Submitted: 2016-09-12 08:43:55

No Duplicates.

Comment 1 for Small Containers of Automotive Refrigerant (smallcans2016) - 15-2.

First Name: dave

Last Name: hamel

Email Address: davebhamel@gmail.com

Affiliation:

Subject: smallcans2016

Comment:

Please abolish the special small can requirements for CFC's that are part of California law. The existing system in California increases the emissions of these chemicals, and increases cost to the end user without environmental benefit.

The unintended consequence of this legislation is that private parties purchase the refrigerant they need when out of state, to avoid the CA deposit and the fiddly fixtures needed for the CA compliant cans on recharging equipment. Commercial shops buy the material in bulk containers that do not have deposits. The real intent of this legislation is in my opinion an attempt to discourage or eliminate home mechanics from doing this work. Many cans are returned partially full, to get the deposit back before it expires, which wastes chemical. Some people I have encountered empty the cans prior to return or over charge the systems.

The cost of 134a in CA is significantly above the cost out of state due to the special packaging. A can is less than \$6 on sale anywhere except CA. Here it runs \$12 plus the deposit. I do my own refrigeration work on my cars due to problems I have had with shops conducting this work, and will continue to do so as long as I can. I do not believe the intent of this program is being achieved, and the CA EPA mission will be enhanced if this program is realistically evaluated and revised to make sense.

Dave

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2016-10-24 12:24:49

No Duplicates.

Comment 2 for Small Containers of Automotive Refrigerant (smallcans2016) - 15-2.

First Name: Heidi
Last Name: Sanborn
Email Address: heidi@calpsc.org
Affiliation: California Product Stewardship Council

Subject: CPSC

Comment:

Attached you will find CPSC's letter of support.

Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/9-smallcans2016-BmVRJ1YkUWFWD1My.pdf>

Original File Name: CPSC ARB Support Letter 10-26-16 FINAL.pdf

Date and Time Comment Was Submitted: 2016-10-26 13:29:35

No Duplicates.