

May 14, 2018

To: Clerk of the Board  
Cc: Dan Garrett  
Ravi Ramalingam  
Joe Calavita  
Jose Gomez

Subject: Multi-purpose Lubricant Amendments

Eveready Products Corporation appreciates the opportunity to comment on the Amendments to the Consumer Products Regulation. These amendments include changes to the category of Multi-purpose lubricants future effective limit.

Eveready Products is an aerosol manufacturer in Ohio. We have been in business for more than 50 years. We are a small business, but have been a viable means of livelihood for hundreds of very different types of family structures found in this country. Also, many of our customers, with nationwide distribution, have been with us for over 50 years. We do a large amount of business in the commercial lubricating market as well as many others. Over the years it has become more technically difficult to formulate products that provide optimum performance that meet regulations, especially in California.

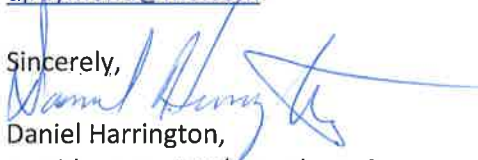
Eveready supports the staff proposal of a product weighted Maximum Incremental Reactivity (MIR) limit of 0.45 with a maximum VOC level of 25%. The use of the Concept of Reactivity in the reduction of ozone formation is sound science. The Aerosol Coating Regulation that CARB developed almost two decades ago has proved this. The reduction in an MIR level in a product always results in an ozone reduction. This is not the case for Mass based regulations. Thus, CARB staff should consider Reactivity options for more Consumer Products.

Eveready supports the sunset of the Annual Reporting. Eveready has several questions that need to be clarified in the regulation. 1. Can the calculation of the Annual Reporting be done by calculating the population density of the state versus national sales? 2. If a product has claims for a chain wire...and a tapping...is this product a Multi-purpose lubricant?

Eveready would like to commend the staff on a thorough development of the Reactivity Option. Eveready believes the emission reductions required in the SIP will be met. In addition this Alternative Option provides flexibility and along with the effective date delay MPL manufactures will be able to provide effective products.

Any questions or comments feel free to contact our consultant Doug Raymond at 740-936-8120 or by e-mail at [djraymond@me.com](mailto:djraymond@me.com).

Sincerely,



Daniel Harrington,  
President, Eveready Products Corp