



Innovative Products For Home. Work. Life.

M. Quinonez
18-4-2

May 24, 2018

via electronic transmission

Clerk of the Board
California Air Resources Board
1001 I Street
P.O. Box 2815
Sacramento, CA 95812
<http://www.arb.ca.gov/lispub/comm/bclist.php>

**Subject: Proposed Amendments to the Consumer Products Regulation¹ and Method 310;²
Board Agenda Item 18-4-2**

Dear Clerk of the Board:

The Household & Commercial Products Association³ (HCPA) appreciates the opportunity to offer comments on the California Air Resources Board (CARB) proposed amendments to the Consumer Products Regulation as it pertains to Multi-Purpose Lubricant Products. Specifically, HCPA can support the challenging, yet technologically feasible, alternate compliance option of a product-weighted maximum incremental reactivity (PWMIR) limit of 0.45 grams ozone/gram for the Multi-Purpose Lubricant product category.⁴

I. HCPA Supports the Proposal to Establish the Technologically Challenging, Yet Feasible, Alternate Compliance Option.

HCPA supports the California Air Resource Board's (CARB's) proposal to establish an alternate compliance option for Multi-Purpose Lubricant Products, which will allow manufacturers the ability to continue to formulate and produce effective products while still improving the air quality. During the past 30 years, CARB has achieved significant improvements in air quality for

¹ The full text of the proposed amendments to the Consumer Products Regulation is posted at: <https://www.arb.ca.gov/regact/2018/cp2018/appa.pdf>.

² The full text of the proposed amendments to Method 310, Determination of Volatile Organic Compounds (VOC) in Consumer Products and Reactive Organic Compounds (ROC) in Aerosol Coating Products: <https://www.arb.ca.gov/regact/2018/cp2018/appb.pdf>.

³ The Household & Commercial Products Association (HCPA) is the premier trade association representing companies that manufacture and sell \$180 billion annually of products used for cleaning, protecting, maintaining, and disinfecting homes and commercial environments. HCPA member companies employ 200,000 people in the U.S. whose work helps consumers and workers to create cleaner, healthier and more productive lives.

⁴ Proposed Section 94509(r).

California residents by developing regulatory standards for consumer products that are based on sound science to achieve the maximum feasible reductions in volatile organic compounds (VOCs).

II. HCPA Supports the July 1, 2019, Effective Date.

HCPA supports the proposed effective date of July 1, 2019, for both the 10 percent by weight VOC limit⁵ and the PWMIR limit of 0.45 grams ozone/gram.⁶ HCPA believes that this proposed compliance date is necessary to provide formulators and manufacturers a reasonable amount of time to assess their multi-purpose lubricants under both compliance options and be able to produce effective and compliant products.

III. Proposed Reporting Requirements

A. Pre-Market Notification

HCPA would like to thank CARB for addressing our previous comments about the reporting requirements to provide the information required in subsection 94509(r)(2)(A) through (2)(C) by reducing the length of time a company must provide the information to CARB before the product can be available for sale *after* July 1, 2019 from 90 days to 30 days. HCPA recommends that CARB staff review the length of time a company must provide the information required in subsection 94509(r)(2)(A) through (2)(C) *before* July 1, 2019 and consider reducing the amount of time a company needs to provide the required information from 90 days to 30 days.

B. Sunset for Annual Sale Reporting

HCPA supports the proposed sunset date of April 1, 2023⁷ for the annual reporting requirement. HCPA understands that CARB staff needs market data to assess VOC emissions for multi-purpose lubricants and the trends of both compliance options. HCPA believes that with this sunset date for the annual reporting requirement, CARB will be able to gather sufficient market information about the multi-purpose lubricant product category to accurately assess the effectiveness of both compliance options.

IV. HCPA Suggestion to Expand Method 310 – Appendix A⁸

HCPA would like to notify CARB that aerosol products are now becoming available in plastic containers as well as metal. As such, HCPA suggests that CARB develops procedures for the propellant collection of plastic aerosol containers as has been done for metal and glass aerosol containers within Appendix A of Method 310.

V. Conclusion

In conclusion, HCPA supports CARB staff's proposal to establish a challenging, yet technologically feasible reactivity-based alternative compliance option to the 10 percent VOC

⁵ Proposed Section 94509(a).

⁶ Proposed Section 94509(r).

⁷ Proposed Section 94513(h)(1).

⁸ Appendix A, Propellant Collection Procedures.


May 24, 2018

Page 3 of 3

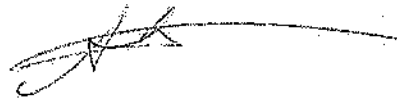
limit for Multi-Purpose Lubricants which provides flexibility for manufacturers to continue offering products with the performance that consumers expect while providing equivalent ozone air quality benefits to the future effective 10 percent by weight mass based VOC limit. HCPA believes that this proposal is based on sound science and will help manufacturers to produce effective products for sale in California while continuing to improve the state's air quality.

If you have any questions about issues presented in these comments, please contact us at 202-872-8110.

Respectfully,



Nicholas B. Georges
Director, Scientific Affairs



Steven D. Bennett, Ph.D.
Vice President, Scientific Affairs



Joseph T. Yost
Vice President, Strategic Alliances
& Industry Relations

cc: Ravi Ramalingam, Branch Chief, Consumer Products and Air Quality Assessment Branch,
Air Quality Planning and Science Division
Jose Gomez, Manager, Technical Development Section, Consumer Products and Air
Quality Assessment Branch, Air Quality Planning and Science Division
Joseph Calavita, Manager, Implementation Section, Consumer Products and Air Quality
Assessment Branch, Air Quality Planning and Science Division
Dan Garrett, Air Pollution Specialist, Consumer Products and Air Quality Assessment
Branch, Air Quality Planning and Science Division
Keith Kennedy, Manager, Special Analyses Section, Northern Laboratory Branch,
Monitoring and Laboratory Division
HCPA Air Quality Committee
Nicole Quinonez, Randlett Nelson Madden

