

September 23, 2013

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95912

via web portal - <http://www.arb.ca.gov/lispub/comm/bclist.php>

Subject: Proposed Amendments to the Consumer Products Regulations

Clerk of the Board:

The Blaster Corporation appreciates the opportunity to comment on the amendments to the Consumer Products regulation. These amendments are to be heard by the California Air Resources Board on September 26, 2013.

For over 50 years, Blaster Corporation has manufactured penetrants, lubricants, rust inhibitors and a full line of specialty, highly concentrated formulas for the automotive, industrial and hardware industries. Blaster has a full-line of specialty lubricant, performance enhancement and cleaning products to serve professionals and DIYers.

The Blaster Company has the following comments.

- Blaster supports the definition change to the Dry Lubricant definition. This change clarifies the regulation. This clarification was needed to ensure that a Dry Lubricant is not regulated in any other category.
- Blaster supports the addition of the terms Single Purpose Cleaner and Single Purpose Degreaser. These terms were needed to clarify that products designed as a specific cleaner/degreaser are not general-purpose products. Certain cleaning applications require specific needs, which cannot always be met by a general-purpose product.
- Blaster supports the change in the future effective date for Multi-purpose Lubricant from 12/31/2015 to 12/31/2018 for the 10% VOC limit. More time is required to do research and development to meet this stringent limit. Currently Blaster does not have a reformulation pathway to meet this limit. Blaster met with CARB twice a year to provide updates on their R & D efforts.
- Blaster supports the scientific studies on the Low Vapor Pressure compounds. Blaster has spent a significant amount of resources on reformulating products using LVP's to the benefit of the Air Quality in California.

In conclusion, Blaster Corporation supports the amendments to the Consumer Product regulation.

Thank you for your consideration to these comments. Any questions or comments feel free to call our consultant Doug Raymond at 440-474-4999 or at djraymond@reg-resources.com.

Sincerely,



Kurt Gabram
Vice President Operations

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