



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 Aerosol Coating Products Regulation and the Consumer Products Regulations

Clerk of the Board:

Stoner Incorporated appreciates the opportunity to comment on the amendments to the Aerosol Coating Products Regulation and the Consumer Products regulation. These amendments are to be heard by the California Air Resources Board on September 26, 2013.

Stoner Incorporated manufactures specialized cleaners, lubricants, and coatings for industrial, commercial, and consumer applications. Founded over 60 years ago by Paul Stoner, the company has enjoyed a history of innovation and accomplishment, often against difficult odds. Today, Stoner's team pursues a mission to Pursue Excellence with Passion while helping customers save time, increase productivity, and improve the quality of their work.

Stoner Inc. has the following comments.

- Stoner Inc. 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.
- Stoner Inc. supports the Multi-purpose Lubricant future effective limit delay. The VOC limit is to become effective on 12/31/2015. More time was needed for research. Staff has delayed the VOC limit to 12/31/2018. This additional time is needed to develop technology to meet this stringent limit.
- Stoner Inc. supports the changes to the Multi-purpose Lubricant and Dry Lubricant definitions. The single use addition to the Multi-purpose Lubricant definition is needed to clarify that products designed for a single use are not subject to the Multi-purpose Lubricant standard. Likewise the Dry Lubricant definition change clarifies that Dry Lubricants are not subject to other lubricant category VOC limits.

- Stoner Inc. supports the additional definitions and changes to the definitions in the Aerosol Coating regulation. The General Coating limits will be extremely challenging to meet. We need as much time as possible to meet these limits. Stoner requests that the 2010 table of MIR values be available for use as soon as possible. The board could instruct enforcement to use the 2010 table of MIR values as soon as the board adopts the new limits.
- Stoner Inc. supports the Specialty Coating limits and the fact that CARB capped these limits to prevent future increases
- Stoner Inc. supports the scientific pathway being taken by the staff in dealing with the Low Vapor Pressure (LVP) provision. LVP compounds are extremely important in maintaining compliance with current and future VOC limits. The LVP provision is needed to provide technical feasibility to the current VOC limits.

In conclusion, Stoner Incorporated supports the amendments to the Aerosol Coating Product Regulation and 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](mailto:djraymond@reg-resources.com).

Sincerely,



Robert W. Sweger, Ph.D.  
R&D Team Leader  
Stoner Incorporated

Cc: Carla Takemoto, Air Resources Board  
Doug Raymond, Raymond Regulatory Resources (3R), LLC