



April 27, 2018

To: Clerk of the Board

Cc: Dan Garrett

Ravi Ramalingam

Joe Calavita

Jose Gomez

Subject: Multi-purpose Lubricant Amendments

The Blaster 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.

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.

Blaster 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 proven this to be a successful regulation for reducing ozone. 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.

Section 94509 (a)

Comment: Blaster supports the extension of the effective date to 7/1/2019. This will provide the manufacturers time to comply with the amendments.

Section 94513(h)(1)

The Responsible Party must report annual sales to the Executive Officer no later than March 31. The annual reporting requirement shall sunset on April 1, 2023.

Comment: Blaster supports the sunset of the annual reporting.

Summary

Blaster Corporation supports the Reactivity option for the MPL future effective limit. This alternative option maintains the emission reductions in the SIP and provides flexibility to the manufacturer to continue to product effective products. This is truly a win win situation.

In addition, the staff was very cooperative to work with on this issue and was extremely thorough in their work on the technology assessment.

Conclusion

Blaster supports the amendments as proposed and commends the staff on a job well done. Any questions or comments feel free to contact our consultant Doug Raymond at 740-936-8120 or by e-mail at djraymond@me.com.

Sincerely,

A handwritten signature in blue ink, appearing to read "Paul Gardner", with a long horizontal flourish extending to the right.

Paul Gardner
VP Operations
The Blaster Corporation