



P.O. Box 80607, San Diego, CA 92138-0607

September 24, 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>

RE: Proposed Amendments to the Consumer Products Regulations

Clerk of the Board:

The WD-40 Company 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.

The WD-40 Company is a \$350 million company doing business in over 185 countries. We work diligently to meet or beat all regulatory requirements we encounter. Our WD-40, 3-In-One and Lava brands are strong in both the industrial and consumer markets. Our Spot Shot, 2000 Flushes, Carpet Fresh and X-14 brands are consumer brands only. We have enjoyed a long and productive proactive working relationship with California Air Resource Board and staff.

The WD-40 Company has the following comments:

- WD-40 supports the change in the future effective date for Multi-purpose lubricants from 12/31/2015 to 12/31/2018. WD-40 has spent significant time and resources on research to comply with the 10% VOC limit. At this time the WD-40 Company does not have a clear path to feasible technology that will comply with the 10% VOC limit. Our company has been in constant contact with CARB staff. Providing quarterly updates to the staff on our research efforts. The delay in the effective date is needed to provide additional time for research and development issues.
- WD-40 supports the staff approach to the Low Vapor Pressure (LVP) issue. The scientific studies for these compounds are justified. Our company has spent significant resources using these compounds in our reformulation efforts. Without the LVP provision, the VOC limit for the lubricant products is not technically feasible.

In closing, WD-40 Company would like to thank the staff for their willingness to meet with us. WD-40 supports the amendments to the Consumer Products regulation. Thank you for your consideration to these comments. Any questions or comments feel free to contact our consultant Doug Raymond at 440-474-4999 or at djraymond@reg-resources.com.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Freeman". The signature is fluid and cursive, with the first name "Michael" and last name "Freeman" clearly distinguishable.

Michael L. Freeman
President –The Americas
WD-40 Company
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619-981-3991

Cc: Carla Takemoto, Air Resources Board
Laurie Nelson, Randlett Nelson Madden
Nicole Quinonez, Randlett Nelson Madden
Doug Raymond, Raymond Regulatory Resources (3R), LLC