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March 16, 2021

Clerks’ Office

California Air Resources Board

1001 I Street

Sacramento, California 95814

<https://www.arb.ca.gov/lispub/comm/bclist.php>

Subject: Comments on Proposed Amendments to the California Consumer Products Regulation; Board Agenda Item # 21-2-1

Dear Board Members:

WD-40 Company appreciates the opportunity to provide comments on the Initial Statement of Reason (ISOR) for the Consumer Products VOC Regulation. The WD-40 Company is a California company that markets Consumer Products. WD-40 Company has worked extensively with CARB to improve the Air Quality of the State of California. CARB has been a leader in directing the Consumer Product Industry to innovate their products to reduce VOC emissions. WD-40 Company and CARB have a shared interest to clean the air for California.

**Comments**

WD-40 Company has worked with staff throughout this rulemaking on several issues. Two issues remain, the first issue is the VOC exemption of the compound Solstice® HFO-1233zd(e). This compound has the following characteristics: being negligibly photochemically reactive thus not available to create ozone, low Global Warming Potential (GWP) and Low Maximum Incremental Reactivity (MIR), which makes this compound an excellent candidate for WD-40 Company to use to create better products for the environment. We request the staff to continue work toward exempting this compound as a VOC in the Consumer Products Regulation. This compound is exempt in the South Coast Air Quality Management District (SCAQMD).

Second issue is the Compressed Gas Innovative Product Exemption (IPE) for compressed gases. WD-40 Company has a long history of working with compressed gases such as CO2. While our product works well, and we applaud the staff’s initiative to provide another provision to assist in reformulation, as written, the IPE for Compressed Gases is unclear and confusing. While WD-40 Company does not make any of the product categories this IPE is targeted for use in, we are hopeful that provisions such as this may expand to other categories. Thus, we believe that the staff should explain or clarify the criteria by adding in calculations. In addition, we support the National Aerosol Association (NAA) IPE comments to add a Reactivity provision.

Reactivity is sound science and most recently a Reactivity Option was added to allow Multi-Purpose Lubricant an alternative way to comply. WD-40 Company supports Reactivity and would request that the staff find a way to include Reactivity in the IPE.

**Conclusion**

WD-40 Company supports continued work on the compound HFO-1233zd(e). WD-40 Company cannot at this time support the staff’s proposal on the compressed gas IPE unless it is clarified. We do commend the staff for the concept. Lastly, WD-40 Company request the Board to instruct the staff to add a Reactivity provision to the IPE. Both the Compressed Gas issue and the Reactivity issue can be dealt with in a 15-day comment period.

Thank you in advance for considering our comments. Any questions or comments feel free to contact our consultant Doug Raymond at 440-339-4539 or at [djraymond@me.com](mailto:djraymond@me.com).

Respectfully,

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