



April 30, 2018

To: Clerk of the Board

Cc: Dan Garrett

Ravi Ramalingam

Joe Calavita

Jose Gomez

Subject: Multi-purpose Lubricant Amendments

The National Aerosol Association (NAA) 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.

The National Aerosol Association (NAA) is an industry group devoted to serving the public's health, safety and hygiene needs through the aerosol product form. The NAA represents marketers, manufacturers, fillers and suppliers to the aerosol market.

The NAA 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.

The NAA has been a strong supporter of the proven concept of reactivity. The NAA was the first association to support the Aerosol Coating Rule developed more than fifteen years ago. The concept of reactivity is sound science to accomplish ozone reduction. NAA encourages the staff to consider reactivity in other upcoming rule developments on Consumer Products.

Conclusion

The NAA supports the amendments as proposed which adds the reactivity option for MPL's. The NAA commends the staff on their innovative thinking and thorough review of the MPL category.

If there are any questions or comments please contact our consultant Doug Raymond at 740-936-8120 or by e-mail at djraymond@me.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Gregory L. Johnson". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

President, National Aerosol Association