

March 18, 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:

Wilsonart Adhesives appreciates the opportunity to provide comments on the Initial Statement of Reason (ISOR) for the Consumer Products VOC Regulation.

Wilsonart Adhesives is a supplier of contact adhesives for the High Pressure Decorative Laminate (HPDL or HPL) industry.

Most of the amendments in this rulemaking do not have an effect on our company. However, we are aware that CARB staff is evaluating the potential VOC exemption for Solstice HFO-1233zd. This compound has been VOC -exempted by the US EPA, it has low Maximum Incremental Reactivity (MIR) and Low Global Warming Potential (GWP). Thus, this compound is a necessary tool to add to our reformulation options. Currently in California there are no options to formulate a non-flammable contact adhesive product. Manufacturers have customers that need a non-flammable VOC compliant formula in the state of California. HFO-1233zd is an excellent candidate to fill this need.

Therefore, Wilsonart respectfully requests the Board to direct staff to continue to consider HFO-1233zd for a VOC exemption at the earliest possible date.

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)

Sincerely,

Eric3

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