

Diversified CPC International, Incorporated

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May 14, 2018

To: Clerk of the Board

cc: Dan Garrett

Ravi Ramalingam

Joe Calavita

Jose Gomez

Subject: Multi-purpose Lubricant Amendments

Diversified CPC International 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.

Diversified CPC International, Inc. is a supplier to the Consumer Products Industry. Our company has a facility in the South Coast Air Quality Management District. Diversified CPC manufactures high purity natural gas liquid aerosol propellants at its processing facility in Anaheim, CA.

Diversified CPC 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 proved this. 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.

Diversified CPC would like to commend the staff on a thorough development of the Reactivity Option. Diversified CPC International believes the emission reductions required in the SIP will be met. In addition, this Alternative Option provides flexibility and along with the effective date delay manufacturers will be able to provide effective products.

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 black ink, appearing to read "William N. Auriemma". The signature is written in a cursive, flowing style.

William N. Auriemma,
President and CEO