November 15, 2010

Air Resources Board
1001 I Street, 23rd Floor
Sacramento, California 95814

Attn: Ms. Lori Andreoni
Manager Board Administration and Regulations Coordination Unit
http://www.arb.ca.gov/lispub/comm/bclist.php

Subject: Comments on Proposed Amendments to the California Consumer Products Regulation; Board Agenda Item #10-10-7

Dear Members of the Board,

The National Aerosol Association (NAA) appreciates the opportunity to comment on the proposed amendments to the Consumer Products Regulation which the CARB staff has developed over the last two years.

NAA is an industry group devoted to serving the public's health, safety and hygiene needs through the aerosol product form. The NAA represents thousands of families whose members work for marketers, manufacturers, fillers and suppliers to the aerosol market. NAA and ARB staff has had an ongoing relationship for over twenty years. Working together, the ARB staff and NAA have been able to reduce VOC emission in aerosol products and maintain the effectiveness of the aerosol products which are used by the consumers. These aerosol products can be vital to the consumer's lives for healthy and safety reasons as well as an improved quality of life.

The NAA supports the staff recommendations with the changes that the ARB staff has proposed for the lubricant category. It is important to the success of these amendments and to the NAA that the lubricant categories remain separate and distinct entities. We look forward to working with the staff to accurately portray these categories.

While our members are committed to attempt to meet the proposed limits, the challenge is significant and appears to be technology-forcing. NAA requests that ARB staff be open to changes in the future if these limits prove to be infeasible.

In closing, we appreciate the opportunity to work with the ARB staff. Again, we support the amendments as proposed with the changes to the lubricant category with the considerations we mention above.

If there are any questions or comments please contact our consultant Doug Raymond at 440-474-4999 or e-mail at djraymond@reg-resources.com.

Sincerely,

Larry Midtbo
President, NAA