

Procter & Gamble

*The Procter & Gamble Company
Ivorydale Technical Center
Household Care, Product Safety & Regulatory Affairs
Cincinnati, Ohio 45217*

November 17, 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

Dear Board Members:

The Procter & Gamble Company (P&G) appreciates the opportunity to provide comments to the California Air Resources Board (ARB) related to your proposal to amend your Consumer Products Regulation. Of specific interest to our Company is your proposal to modify the category limit for General Purpose Cleaners (GPCs). P&G is a leading producer and marketer of GPCs in California specifically, and in the US generally. Many of our products, and the consumers who use these products, would be impacted by any proposed provisions regulating the volatile organic compound (VOC) content of GPCs. Therefore, P&G has a significant interest in ARB's proposal affecting General Purpose Cleaners. Included below are our comments regarding your proposal.

1. We request that ARB strongly consider our proposal to create a new category of products termed "Special Purpose Floor Cleaners".

P&G provided two technical presentations to ARB staff regarding a unique niche of floor cleaning products termed "Special Purpose Floor Cleaners". These products are often part of an integrated cleaning system consisting of a bottle of cleaning solution, delivery implement, and pad. Once these products are applied to floors, they are removed by the pad without the aid of additional water. Data provided to CARB staff demonstrated the unique ergonomic and hygienic benefits of these products. Further, we showed how Special Purpose Floor Cleaners are valued by the elderly and those with physical limitations as lightweight, effective alternatives to traditional floor cleaning methods (such as the mop and bucket). We also provided data showing how reducing the current solvent system and replacing with other non-VOC alternatives leads to products with slower drying times and a greater slipperiness once floors are rewetted. Thus, we have proposed that a new category carrying a VOC limit of 3.0% be created to define these products:

"Special-Purpose Floor Cleaner" means a cleaning product labeled exclusively for use in being applied to hard-surface flooring and wiped off without transfer of soil to a liquid reservoir. "Special-Purpose Floor Cleaner" does not include "Floor Maintenance Product," "Floor Polish or Wax" "Floor Wax Stripper," "Spray Buff Product," or "Wood Cleaner."

We strongly encourage the Board to consider our proposal to ensure these products continue to be available and effective for those who desire efficient and lightweight floor cleaning options in their home.

2. The proposed GPC limit of 0.5% is a dramatic reduction from the current limit of 4.0% and presents severe technological challenges for some types of GPCs

P&G, with CSPA member stakeholder input, led the development and delivery of two separate technical presentations to ARB staff detailing the technological role that solvents (which happen to be classified as VOCs) play in GPC function. Specifically, GPC products that are not used in conjunction with copious amounts of water require additional solvents to deliver a number of benefits that consumers expect, such as haze and streak-free cleaning. These products include product types such as spray and wipe GPCs for countertops and appliances as well as specialty cleaners designed for floors (see proposed category of Special Purpose Floor Cleaners in Point 1 above). We recognize that GPCs designed to be used with large amounts of water (such as those used for mop and bucket floor cleaning) do not generally require solvents for efficacy. As such, we do not object to a 0.5% limit for these types of GPCs. While we have serious concerns about a 0.5% limit for spray and wipe products used in general cleaning tasks (such as countertops and appliances), we would not oppose implementation of a lower limit if provisions were made to create a new, niche category of specialty cleaners termed "Special Purpose Floor Cleaners" (see Point 1).

3. The proposed implementation date will be exceedingly difficult to meet, especially for GPCs that are health benefit products

The proposed implementation date of 12/31/2012 presents a significant burden to manufacturers of General Purpose Cleaners, especially those companies that market cleaners that are also antimicrobial products. Due to the additional regulatory burden antimicrobial products face, the Consumer Products Regulation already provides another year for the implementation of new VOC limits for antimicrobial products. However, even with this additional year, it will be very challenging to successfully reformulate and register antimicrobial products by the end of 2013. In spite of these challenges, we do not oppose a 12/31/2012 implementation date if a category to describe certain specialty floor cleaners (described above) is created.

We ask that ARB kindly consider the above comments prior to adopting the draft proposal offered by ARB staff.

Sincerely,
The Procter & Gamble Company



John T. Stickney, Ph.D.
Senior Scientist, Regulatory Affairs
Global Household Care

cc: Richard Corey, Chief, Stationary Source Division
Janette Brooks, Chief, Air Quality Measures Branch, Stationary Source Division
Carla Takemoto, Manager, Technical Evaluation Section, Stationary Source Division
David Mallory, Manager, Measures Development Section, Stationary Source Division
Judy Yee, Manager, Implementation Section, Stationary Source Division
Nicholas Berger, Air Pollution Specialist, Air Quality Measures Branch
D. Douglas Fratz, V.P., Scientific & Technical Affairs, CSPA
Joseph T. Yost, Director, State Affairs, CSPA