

Raymond Regulatory Resources (3R), LLC

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Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, California 95814
<http://www.arb.ca.gov/lispub/comm/bclist.php>

Subject: 15-Day Notice of Modifications to the Original Proposed 2010 Amendments to the California Consumer Products Regulation

Dear Board Members:

Raymond Regulatory Resources (3R) appreciates the opportunity to comment on the California Air Resources Boards (ARB's) 15-Day Notice of Public Availability of Modified Text for Public Hearing to Consider Adoption of Proposed Amendments to the California Consumer Products Regulation. This document was released on July 20, 2011 and the deadline for these comments is August 4, 2011.

The changes detailed in this document appear to be consistent with the November 18, 2010 board hearing. First, the staff is to be commended for simplifying and clarifying the lubricant definition section of the regulation and adding definitions such as Firearm Lubricant to clarify which lubricants are not subject to the regulation.

Second, the reference to food-servicing environment under the Lubricant definition should be clarified. Currently, any product that is used in a manufacturing setting is exempt from the ARB's consumer product rule. A significant portion of food grade lubricants are used in Meat and Poultry plants as well as other manufacturing settings which process food or food containers. Products used in these manufacturing facilities should not be subject to the consumer product regulation. Therefore, I would request that this issue be clarified to ensure that food grade lubricants for use in manufacturing facility are not subject to the consumer product regulation.

3R appreciates the opportunity to file comments and thank you for your consideration to this issue.

Respectfully Submitted



Douglas Raymond

cc: Carla Takemoto, Chief, Consumer Products and New Strategies Branch