



Tim Carmichael

November 15, 2006

06-10-8

November 16, 2006

Dr. Robert F. Sawyer
Chairman
California Air Resources Board
1101 I Street
Sacramento, CA 95814

Re: VOC Limits for Consumer Products Regulation

Dear Dr. Sawyer:

I am writing in support of the original staff proposal to lower VOC limits for automotive aerosol cleaning products to 10%.

In the Consumer Products Regulation that will be heard by the ARB Board on Friday, November 17, staff is proposing to lower VOC limits for automotive aerosol cleaning products, from about 45% to 10%, for the categories of brake cleaning, general purpose degreasing, engine degreasing and carburetor and fuel injection system cleaning.

It is our understanding; however, that staff is considering weakening their proposal. The original proposal requests a reduction of the VOC limit from the current level of about 45% to 10% by the end of 2008. The weaker proposal would give the industry an interim limit of 20% and then a final limit of 10% by the end of 2012.

Since there are already products in the market that comply with the 10% limit, there is no reason to delay this reduction until 2012. We oppose any efforts to relax or weaken this regulation. Given how much still needs to be done to attain national health-based air quality standards, ARB must maximize the pollution reduction for every new regulation.

There is ample information showing that alternative, low-VOC cleaners are effective and that facilities can operate profitably with aerosol products with very low VOC content. The Institute for Research and Technical Assistance (IRTA) conducted a technology development and assessment project for ARB, which focused on alternative automotive aerosol cleaning materials. The results of the IRTA/ARB project indicated that a 10% VOC limit for the four categories of cleaning could be met with safer products. In other projects, IRTA research also demonstrated that water-based cleaners are suitable alternatives for aerosol brake cleaners.

Additionally, because of South Coast Air Quality Management District (SCAQMD) regulation of aerosol cleaners, many auto shops in the South Coast Basin have been using

100 % acetone aerosol products for the last few years. These products have essentially zero VOC.

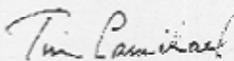
Furthermore, because of the availability of low-VOC cleaners, some facilities have adopted policies that forbid the use of aerosols in their shops. One such company is Midas Muffler. Southern California Midas Muffler shops are also using water-based brake cleaning products. Other facilities have decided to forego the use of aerosols and are using spray bottles with water-based cleaners for all of their cleaning.

The examples cited above indicate that aerosols with 45% VOC are not necessary for auto repair operations. Shops can use aerosols with 10% VOC or other low VOC alternatives in equipment or spray bottles.

I strongly support the staff proposal for automotive aerosol cleaning products of 10%. Auto repair shops are already using products with low VOC content and the 10% limit has been demonstrated in practice. I urge you and the other Board members to vote in favor of the staff proposal in November.

We remain committed to working with you to reduce VOC emissions from automotive aerosol cleaning materials, and encourage the use of non-toxic, non-smog forming alternatives to protect the health of all Californians.

Sincerely,



Tim Carmichael
Coalition for Clean Air