

Barry Wallerstein



South Coast Air Quality Management District



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November 15, 2006

Dr. Robert F. Sawyer, Chairman
State of California Air Resources Board
1001 "T" Street
P.O. Box 2815
Sacramento, CA 95812

Reference: Rulemaking to Consider Adoption of Proposed Amendments to the California Consumer Products Regulations (November 16, 2006)

Dear Dr. Sawyer:

The South Coast Air Quality Management District (SCAQMD) staff urges your Board to adopt the amendments to the Regulations for Reducing Volatile Organic Compounds (VOC) Emissions from Consumer Products. Adopting this amendment would be a significant step forward in meeting the formidable challenge of achieving clean air.

In order for the SCAQMD to meet the federal 8-hour ozone standard, an additional 50 percent of VOC emissions will need to be cut. A substantial portion of VOC emissions are from consumer products. By 2020, they will be the largest source of VOC emissions in the South Coast Air Basin. We are relying on your Board to substantially accelerate your emission reduction programs to achieve healthful air for the 16 million residents of the South Coast Air Basin and this regulation, scheduled for public hearing on November 17, 2006, serves as a substantial step in this direction.

We concur with the conclusions of your staff report that compliant products are already available, the proposed limits are cost effective and the emission reductions are substantial and significant. In all but one of the 19 categories considered, there are products that meet the future limits. These products have successfully competed in the open market where performance and cost are the dominant factors for consumer preference.

With respect to automotive aerosols, many large dealerships within the South Coast Air Basin are required by Rule 1171 – Solvent Cleaning Operations, to use aerosol brake cleaners, carburetor cleaners, engine degreasers and general purpose degreasers that have a VOC content less than the Board's proposed limits. These dealerships have used the ultra-low VOC products for more than a decade. While using these products, they have maintained the quality work their customers expect and remained competitive and profitable. We are also aware of several independent studies demonstrating the effectiveness of low VOC aerosol and non-aerosol products used in

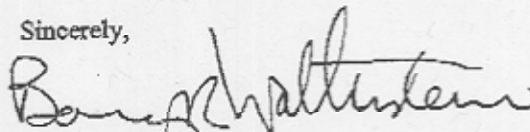
automotive repair shops for brake cleaning, carburetor cleaning, engine degreasing and general purpose degreasing. Based on this direct experience, we see no need for interim limits or delayed implementation dates.

With respect to household, building maintenance and general purpose cleaners, the SCAQMD concurs with the California Department of General Services' "Green Building" initiative Best Practices Manual which states that "many green or environmentally preferred cleaning products are as effective as traditional cleaners" and that "environmentally preferable cleaners are generally competitively priced." These cleaners include hand, glass, bathroom and general purpose cleaners, and floor care products.

Additionally, the proposed limits for Construction, Panel, and Floor Covering Adhesives would make California Air Resources Board's limits and SCAQMD's limits essentially equivalent. While the product category descriptions do not exactly match and there are differences about how each agency calculates VOC content, the reduction of VOC content will bring more uniformity between the two agencies' requirements for these types of adhesives.

In conclusion, we recommend that your Board adopt the proposed amendments to the Regulations for Reducing Volatile Organic Compounds (VOC) Emissions from Consumer Products. We strongly support your action that will allow the 2003 State Implementation Plan (SIP) commitments to be met and assist in the efforts of SCAQMD's and all California air districts' efforts in achieving clean air for the residents of California. We encourage you to continue aggressively pursuing additional emission reductions in consumer product categories in 2007 and beyond. We look forward to working closely with your Board towards attaining our mutual goals of reaching attainment of State and Federal air quality standards and further protecting the health of all Californians.

Sincerely,



Barry R. Wallerstein, D.Env.
Executive Officer

BRW/EC/LL/dd/mmm

cc: Elaine Chang
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