



*Automotive Service Councils of California*  
Professionals in Automotive Service ~ Since 1940

## **Automotive Service Councils Of California**

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### **We support ASE**

October 30, 2006

David Mallory, P.E.  
Manager, Measures Development Section, Stationary Source Division  
California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812  
[dmallory@arb.ca.gov](mailto:dmallory@arb.ca.gov)

Dear Mr. Mallory:

The Automotive Service Councils of California (ASCCA) and its 1800 members are very concerned about the VOC emission standards for four automotive maintenance product categories in the proposed CONS-2 regulation.

The proposed 10% VOC standard for Brake Cleaners, Carburetor or Fuel-Injection Air Intake Cleaners, Engine Degreasers, and General Purpose Degreasers will damage our ability to effectively clean and maintain vehicles. These standards will also increase the cost of automotive maintenance because of slower-drying and less effective brake cleaners and other automotive maintenance products. As cleaning efficacy is reduced, pollution from poorly operating emissions system will increase. At what point is the gain of reduced VOC emissions countered and/or defeated by the increase in NOX, HC, and CO emissions?

We are additionally greatly concerned that the rule may have ancillary impact on chemicals used to flush air conditioning systems. The ability to clean these components greatly reduces the need to replace them after failure of air conditioning compressors as well as drastically reduces the need for future repairs and the environmental impacts of those repairs. Because A/C systems must be absolutely clean, chemicals with poor evaporative qualities are simply unworkable.

ASCCA understands that the automotive product industry has already reduced emissions from these products and has offered to make additional reductions. Therefore we believe that ARB needs to reconsider its 10% VOC standards and consider a compromise that will protect California's air quality without having a negative impact on our member's ability to provide quality vehicle maintenance at a reasonable cost.

Sincerely,

Dan Fogle  
ASCCA President

***ASC Mission Statement: To provide business resources for our members  
and to advance the professionalism of the automotive repair industry.***