Institute for Research and Technical Assistance
a nonprofit organization

IRTA

November 6, 2006

Clerk of the Board
Air Resources Board
1001 I Street, 23rd Floor
Sacramento, CA 95814

BY REGULAR MAIL AND FAX

Re: Support of Consumer Products Proposal for November 16-17 Public Hearing

To Whom It May Concern:

I am writing on behalf of the Institute for Research and Technical Assistance (IRTA), a technical nonprofit organization established in 1989. IRTA focuses on identifying, testing, developing and demonstrating low-VOC, low toxicity alternatives in solvent applications for individual companies and whole industries.

In the Consumer Products Regulation that will be heard by the ARB Board on November 16 and 17, the ARB is proposing to establish lower VOC limits for automotive aerosol cleaning products. The staff proposal would reduce the VOC limit from about 45% to 10% for the categories of brake cleaning, general purpose degreasing, engine degreasing and carburetor and fuel injection system cleaning. I am writing to urge the Board to adopt this lower limit.

IRTA conducted the technology development/assessment product for ARB that focused on alternative automotive aerosol cleaning materials. IRTA has also conducted a variety of other projects that focus on cleaning alternatives in auto repair facilities over the last several years. The alternatives that are being used by auto repair facilities include water-based cleaners, soy based cleaners and acetone based cleaners. The results of the IRTA/ARB project indicated that a 10% VOC limit for the four categories of cleaning could be met with these safer products. In other projects, IRTA demonstrated that water-based cleaners used in small, portable pieces of equipment and in spray bottles are suitable alternatives for aerosol brake cleaning.

The South Coast Air Quality Management District (SCAQMD) also regulates aerosol cleaners when facilities use more than 160 fluid ounces (about 10 cans) of the cleaners in a day. The SCAQMD regulation primarily affects dealerships who use aerosol products extensively. Many of the dealerships in the South Coast Basin have been using 100% acetone aerosol products for the last few years. These products use carbon dioxide propellants and have essentially zero VOC. This demonstrates that the alternative low-VOC cleaners are effective and that facilities can operate profitably with aerosol products with very low VOC content.

Some facilities have policies that forbid the use of aerosols in their shops. One such company is Midas Muffler. In Southern California, where stringent VOC regulations apply to cleaners used in equipment, the Midas Muffler shops are using water-based brake cleaning systems. Other facilities have decided to forego the use of aerosols and are using spray bottles with water-based cleaners for all of their cleaning.

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The examples cited above indicate that aerosol cleaners with 45% VOC are not necessary for auto repair operations. Shops can use aerosols with 10% VOC or they have various options for using low-VOC materials in equipment or spray bottles.

Over the last 10 years or so, IRTA has worked with hundreds of auto repair shops on low-VOC, low toxicity cleaning alternatives. Most of the workers in auto repair shops are people of color who have low income. The people who live in communities surrounding limit of 20% and to delay the effective date 3. [illegible] of the VOC solvents used being achieved today and there is no reason to provide an interim limit or to delay the compliance date by six years.

I strongly support the original staff proposal for reducing the VOC content of automotive aerosol cleaning products to 10% and to keep the effective date of 2008. Auto repair shops are already using products with low VOC content and the 10% VOC limit has been demonstrated in practice. The VOC reduction that can be achieved by reducing the limit to 10%, seven tons per day, is very significant. I urge the Board to vote in favor of reducing the VOC limit to 10% at the November Board hearing.

If you have questions or would like to discuss the issue further, please contact me at (818) 244-0300.

Sincerely,

Katy Wolf

Katy Wolf, Ph.D.
Executive Director