

## **Comment 1 for Consumer Products Test Method 310 (cpmthd310) - 45 Day.**

First Name: Reinhard

Last Name: Oppl

Email Address: ReinhardOppl@eurofins.com

Affiliation:

Subject: Low VOC determination with method 310 not very reliable

Comment:

Low VOC coatings, adhesives etc. are difficult to assess by present method 310 using gravimetric determination of all volatiles (weight loss during 1 hour of heating) and then subtraction of evaporated water:

- 1) With low VOC products, sensitivity and accuracy go down.
- 2) With high water content and low VOC content, the limited accuracy of water determination method will overrule any findings of the low VOC content, resulting in very bad reliability.
- 3) All this is even worse for cement based tile adhesives that are almost impossible to determine with method 310.
- 4) Modern water-based products then are punished relative to solvent-based products due to weakness of test method, which cannot be the meaning of method 310.

The proposed change (direct gas chromatographic determination) is basically excellent, but it should not refer to analytical methods dealing with completely different issues (industrial emissions, or solid waste), when a low VOC paint specific method is available:

ASTM D6886-03. Please use ASTM D6886-03 for low VOC products.

Best regards, Reinhard Oppl, Eurofins Product Testing A/S,  
Galten/Denmark and San Ramon/California

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2009-08-17 09:38:44

No Duplicates.

## **Comment 2 for Consumer Products Test Method 310 (cpmthd310) - 45 Day.**

First Name: Steve

Last Name: Bunting

Email Address: sbunting@nbfd.net

Affiliation: So. California Fire Prevention Officers

Subject: Consumer Products Regulation Amendments-Solvents

Comment:

REF: Section 94512, "Administrative Requirements", subsection (e), "Additional Requirements for Multi-purpose Solvents and Paint Thinners.", (2)

The Southern California Fire Prevention Officers feel that Section 94512(e)(2)(B)1, lacks specificity and may result in tags that are too small to adequately deliver the intended message. While our proposed additional language will serve to standardize the message, It does not restrict the manufacturers from using colors or logos associated with their brand.

Tag specifications are found in other sections of the California Administrative Code. Please see CAC Title 19, Article 9, Section 596 through 596.16

In addition, we believe that the message should be printed in at least five languages, including, Chinese, English, Korean, Spanish and Vietnamese.

Attachment: 'www.arb.ca.gov/lists/cpmthd310/2-solvent\_tags\_1.docx'

Original File Name: Solvent tags 1.docx

Date and Time Comment Was Submitted: 2009-08-17 15:03:57

No Duplicates.

## **Comment 3 for Consumer Products Test Method 310 (cpmthd310) - 45 Day.**

First Name: James  
Last Name: Sell  
Email Address: jsell@paint.org  
Affiliation: NPCA/SCCT

Subject: Auot Refinish Issues and Sought Clarifications in Proposed Multipurpose Solvent Rule

Comment:

September 11, 2009

Dave,

Thanks for the clarification of my understanding of the proposed rule.

"1. I would agree with the first paragraph if it were changed to read:

To follow up on our recent telephone call, if I understood you correctly, it is CARB's position that solvents and reducers that are specifically designed to be used with in a marine/pleasure craft coating or for an automotive refinish coating are not included in the proposed regulation of multi-purpose solvents and paint thinners."

If at all possible, we would like to have this formally stated by perhaps a statement in the rule preamble of the rule, an interpretation from enforcement, or letter.

In discussing this further with the refinish coating manufacturers- a couple of questions continue to linger.

First there remains a great concern about what appears to be CARB's view of treating the refinishing of vehicles as if it is not an "industrial process". As I have said before, there is very little difference in the way a car is refinished and originally painted in that paint is being applied in both operations under controlled circumstances. The need for solvents to clean application equipment and to prepare surfaces to be painted is the same. The coatings themselves are also very similar. An additional factor to consider is that refinishing of vehicles has been on object of regulation by the districts for nearly two decades and they have always treated it as a stationary source like they treat the OEM automotive operations. The cleaning solvent usage is also housed in industrial operations regulations such as Rule 1171 in the SCAQMD.

Also noteworthy is that in multipurpose solvent surveys conducted by CARB, refinish coatings manufacturers were instructed to isolate from the survey those cleaning and surface preparation solvents that were being sold to body shops from that those that were being

made available to the general public.

Further, CARB has also indicated that because it takes place in stationary sources setting refinish operations should not be subject to the regulation.

"TBAC would remain exempt for industrial uses (auto-refinish coatings (Statewide) and industrial maintenance coatings (AQMD area only)) where is has already been delisted. The consumer product regulations do not impose any restrictions on pollution-generating activities that take place at stationary sources."  
<http://www.arb.ca.gov/consprod/regact/cpwg2008/table2.pdf>

So we respectfully request that CARB state in the preamble to the rule as clearly as it did in the above document that refinish operations are not subject to the regulation because auto refinish is an "industrial use" of the solvents and moreover the refinish operations occur at a stationary source and "consumer product regulations do not impose any restrictions on pollution-generating activities that take place at stationary sources."

Further, CARB in developing and issuing a Suggested Control Measure (SCM) for Automotive Refinish Operations explicitly treated the operations as a stationary source operation and suggested a VOC limit of 25 g/l for cleaning solvents and surface preparation at such stationary source operations. If refinish operations were subject to CARB's independent consumers products authority then there would have been no need to issue the SCM for consideration and adoption by the individual air districts- it could have directly regulated the operations.

Consequently, if one were to take the position that cleaning solvents and surface preparation solvents used in a refinish shop are not industrial products the question would be which regulatory regime controls in say SCAQMD: Rule 1171 for industrial solvent cleaning? Rule 1143 for consumer products solvents? And/or only aspects of CARB's proposed rule and if so which ones?

In addition to the issues stated above, there is the practical concern for the industry's efforts to keep such materials in the hands of only professional users for industrial applications. Treating them as essentially "consumer products" in a regulatory program undermines these industry efforts.

Finally, we need clarity on the impact of the proposed rule in air districts where the national VOC refinish rule prevails. The solvent borne systems used there also use comparatively higher solvent cleaning and surface preparation materials.

We believe that the issues discussed above support the rational that refinish operations should be treated as an industrial process as a whole, while not trying to isolate and identify individual activities within the process as other than industrial. Like other industrial processes, required cleaning and surface preparation materials in refinish shops are not generic, but are designed for use at such operations.

I will be glad to discuss this with you further.

Sincerely,

Jim Sell  
Senior Counsel  
NPCA/FSCT

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Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2009-09-14 11:05:11

No Duplicates.

**Comment 4 for Consumer Products Test Method 310 (cpmthd310) - 45 Day.**

First Name: Gregory

Last Name: Johnson

Email Address: Non-web submitted comment

Affiliation:

Subject: Sherwin-Williams Diversified Brands

Comment:

please see attached

Attachment: 'www.arb.ca.gov/lists/cpmthd310/5-conscomment.doc'

Original File Name: CONSComment.doc

Date and Time Comment Was Submitted: 2009-09-15 09:44:26

No Duplicates.

**Comment 5 for Consumer Products Test Method 310 (cpmthd310) - 45 Day.**

First Name: Joseph

Last Name: Yost

Email Address: jyost@cspa.org

Affiliation: Consumer Specialty Products Association

Subject: Board Agenda Item # 09-8-4; Proposed Amendments to the California Consumer Products Regula

Comment:

Attached, please find a copy of CSPA's comments on the proposed amendments to the existing California Consumer Products Regulations.

Attachment: 'www.arb.ca.gov/lists/cpmthd310/6-cspa\_comments\_on\_arb\_proposed\_2009\_amemdments\_-\_board\_agenda\_item\_09-8-4.pdf'

Original File Name: CSPA Comments on ARB Proposed 2009 Amemdments - Board Agenda Item 09-8-4.pdf

Date and Time Comment Was Submitted: 2009-09-21 08:45:57

No Duplicates.

**Comment 6 for Consumer Products Test Method 310 (cpmthd310) - 45 Day.**

First Name: David

Last Name: Darling

Email Address: ddarling@paint.org

Affiliation:

Subject: NPCA/FSCT Comments

Comment:

Attached are comments from the NPCA/FSCT.

Attachment: 'www.arb.ca.gov/lists/cpmthd310/7-carb92009.doc'

Original File Name: CARB92009.doc

Date and Time Comment Was Submitted: 2009-09-21 11:33:18

No Duplicates.



## **Comment 7 for Consumer Products Test Method 310 (cpmthd310) - 45 Day.**

First Name: Dency

Last Name: Nelson

Email Address: dln52@verizon.net

Affiliation:

Subject: Reduce VOCs on September 24

Comment:

To: Chairman Mary Nichols  
California Air Resources Board  
1001 "I" Street  
P.O. Box 2815  
Sacramento, CA 95812

Re: Reduce VOCs on September 24th

Dear Chairman Nichols:

I applaud the California Air Resources Board's (CARB) efforts to reduce the emissions of volatile organic compounds (VOCs) from consumer products.

I strongly encourage you to lead the way in reducing harmful toxics found in consumer and industrial products, specifically multipurpose solvents and paint thinners. By regulating and limiting these chemicals from our products, the state of California would again set a precedent in protecting our environment and the health of families and workers.

VOCs endanger the health of those who come in contact with them. We are all vulnerable to the harmful effects of these chemicals, which are often emitted by products used where we live and work, as well as where our children study and play.

Many children in our communities suffer from asthma, and the chemicals emitted by consumer and industrial products, only increase the chances of more frequent attacks or develop asthma in the future. Workers, and others on the front lines of exposure, may experience an increased risk of cancer or liver and kidney damage from daily use of these toxic substances.

As a consumer and concerned citizen, I urge CARB to adopt tough regulations on consumer and industrial multipurpose solvents and paint thinners.

Please take this opportunity to protect the health of our families by significantly reducing these air pollutants that emanate from multipurpose solvents and paint thinners.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2009-09-21 12:42:17

179 Duplicates.

**Comment 8 for Consumer Products Test Method 310 (cpmthd310) - 45 Day.**

First Name: F.H.

Last Name: Brewer

Email Address: Non-web submitted comment

Affiliation:

Subject: S.C. Johnson & Son, Inc.

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/cpmthd310/104-johnson.pdf'

Original File Name: Johnson.pdf

Date and Time Comment Was Submitted: 2009-09-21 16:43:54

No Duplicates.

**Comment 9 for Consumer Products Test Method 310 (cpmthd310) - 45 Day.**

First Name: Leslie

Last Name: Berry

Email Address: Leslie\_Berry@americanchemistry.com

Affiliation: American Chemistry Council

Subject: American Chemistry Council Solvents Industry Groups Consumer Product Comments  
Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/cpmthd310/105-acc\_sig\_carb\_cp\_comments\_092209.zip'

Original File Name: ACC SIG CARB CP comments 092209.zip

Date and Time Comment Was Submitted: 2009-09-22 06:09:49

No Duplicates.

**Comment 10 for Consumer Products Test Method 310 (cpmthd310) - 45 Day.**

First Name: Doug

Last Name: Raymond

Email Address: drraymond@reg-resources.com

Affiliation: WM Barr & Comapny, Inc.

Subject: NAA Comments on Consumer Product Amendments Board Agenda #09-8-4

Comment:

These comments go along with a DVD that will be distrubuted.

Attachment: 'www.arb.ca.gov/lists/cpmthd310/171-skmbt\_c35309092016470\_\_3\_.pdf'

Original File Name: SKMBT\_C35309092016470 (3).pdf

Date and Time Comment Was Submitted: 2009-09-22 11:55:59

No Duplicates.

**Comment 11 for Consumer Products Test Method 310 (cpmthd310) - 45 Day.**

First Name: Doug  
Last Name: Raymond  
Email Address: djraymond@reg-resources.com  
Affiliation: The National Aerosol Association

Subject: NAA Comments on Consumer Product Amendments Board Agenda #09-8-4  
Comment:

Please find attached comments on behalf of the National Aerosol Association (NAA). Thank you.

Attachment: 'www.arb.ca.gov/lists/cpmthd310/172-naa\_comments\_on\_arb\_proposed\_board\_agenda\_item\_09-8-4.doc'

Original File Name: NAA comments on ARB proposed Board Agenda Item 09-8-4.doc

Date and Time Comment Was Submitted: 2009-09-22 11:58:59

No Duplicates.

**Comment 12 for Consumer Products Test Method 310 (cpmthd310) - 45 Day.**

First Name: Larry  
Last Name: Greene  
Email Address: lgreene@airquality.org  
Affiliation: SMAQMD

Subject: Comments on the Proposed Amendments to the California Consumer Products Regulations

Comment:

See attached letter dated 9/22/09.

Attachment: 'www.arb.ca.gov/lists/cpmthd310/193-david\_mallory\_\_carb\_re\_1291\_comments\_on\_arb\_consumer\_product\_regulation\_\_2\_.doc'

Original File Name: David Mallory, CARB re 1291\_Comments on ARB Consumer Product Regulation (2).doc

Date and Time Comment Was Submitted: 2009-09-22 16:25:10

No Duplicates.

## **Comment 13 for Consumer Products Test Method 310 (cpmthd310) - 45 Day.**

First Name: Daniel

Last Name: Tennant

Email Address: dantw1@yahoo.com

Affiliation: none

Subject: elimination of

Comment:

The elimination of emissions of consumer products, that strikes at what every person in this state uses and sells. I don't know what this is aimed at, but I see the price of every product in this state going up, while the wind blows China's pollution to our shore.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2009-09-22 23:54:16

No Duplicates.



## **Comment 14 for Consumer Products Test Method 310 (cpmthd310) - 45 Day.**

First Name: Heriberta  
Last Name: Sandoval  
Email Address: anjalid@seiulocal1877.org  
Affiliation:

Subject: Reduce VOCs to protect workers  
Comment:

Heriberta Sandoval,  
11703 Pioneer Blvd #20  
Norwalk, CA 90650

September 24, 2009

Mary Nichols  
Chairman  
California Air Resources Board  
1001 "I" Street  
P.O. Box 2815  
Sacramento, CA 95812

Dear Chairman Nichols:

I want to thank your agency's staff for your efforts to reduce emissions of volatile organic compounds (VOCs) and protecting the health of workers like me.

I am addressing you as a janitor who has been cleaning supermarkets for more than 15 years, as well as a concerned parent and consumer. I want to encourage your staff to continue working hard to reduce more toxic chemicals from products like multi-purpose solvents and paint thinners.

I am very committed to my job and I work hard to keep these supermarkets clean and open every day. However, on a daily basis I have to use harsh chemicals to clean the store. These chemicals and cleaning products cause a lot of damage - sometimes corroding my shoes and clothes. My co-workers and I constantly get headaches, nose bleeds, eye irritations and burns to our hands. Some janitors have developed serious asthma and other breathing problems.

I strongly encourage you to support your staff by setting the VOC limit to 3% and ask you to move the implementation date for multi-purpose solvents to 2012. Many products in the market already emit only 3% of VOCs. We believe that by moving the date for multi-purpose solvents, CARB will reduce the health impacts associated with the misuse of these products at our work places.

Finally, I would like to remind you that janitors like me, are waiting for a strong regulation of janitorial products and hope you will remind your staff they need to include them in the 2010 Consumer Products regulation. The regulation of janitorial products is a very important protection in our work.

Again, thank you for your commitment.

Sincerely,

Heriberta Sandoval,

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2009-09-23 11:28:23

No Duplicates.

## **Comment 15 for Consumer Products Test Method 310 (cpmthd310) - 45 Day.**

First Name: Luis  
Last Name: Cabrales  
Email Address: luis@coalitionforcleanair.org  
Affiliation:

Subject: 2009 Consumer Products Regulation Amendments  
Comment:

Please see the attached comments on behalf of the following organization:

COALITION FOR CLEAN AIR  
CLEAN AIR NOW  
SEIU-USWW  
ASIAN COMMUNITIES FOR REPRODUCTIVE JUSTICE ENVIRONMENT CALIFORNIA  
CENTER FOR PUBLIC ENVIRONMENTAL OVERSIGHT  
BAY AREA HEALTHY 880 COMMUNITIES-SL  
NATURAL RESOURCES DEFENSE COUNCIL  
AMERICAN LUNG ASSOCIATION IN CALIFORNIA  
ENVIRONMENT NOW  
SIERRA CLUB CALIFORNIA  
TRI-VALLEY CARES  
WOMEN'S VOICES FOR THE EARTH  
GREEN SCHOOLS INITIATIVE  
SIERRA CLUB-ANGELES CHAPTER  
EARTH DAY L.A.  
REGIONAL ASTHMA MANAGEMENT AND PREVENTION/  
COMMUNITY ACTION TO FIGHT ASTHMA  
INSTITUTO DE EDUCACIÓN POPULAR DEL SUR DE CALIFORNIA  
COMMUNITIES FOR A BETTER ENVIRONMENT  
CALIFORNIA HEALTHY NAIL SALON COLLABORATIVE  
TEENS TURNING GREEN

Attachment: 'www.arb.ca.gov/lists/cpmthd310/196-2009\_carb\_reg\_comments\_092409.pdf'

Original File Name: 2009 CARB Reg Comments\_092409.pdf

Date and Time Comment Was Submitted: 2009-09-23 11:48:00

No Duplicates.

**Comment 16 for Consumer Products Test Method 310 (cpmthd310) - 45 Day.**

First Name: Heidi

Last Name: McAuliffe

Email Address: Non-web submitted comment

Affiliation:

Subject: National Paint & Coating Association

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/cpmthd310/197-cpmthd0001.pdf'

Original File Name: cpmthd0001.pdf

Date and Time Comment Was Submitted: 2009-10-05 16:22:50

No Duplicates.

**Comment 1 for Consumer Products Test Method 310 (cpmthd310). (At Hearing)**

First Name: Chet

Last Name: Thompson

Email Address: Non-web submitted comment

Affiliation:

Subject: American Chemistry Council

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/cpmthd310/198-chet.pdf](http://www.arb.ca.gov/lists/cpmthd310/198-chet.pdf)

Original File Name: Chet.pdf

Date and Time Comment Was Submitted: 2009-10-06 10:00:20

No Duplicates.

**Comment 2 for Consumer Products Test Method 310 (cpmthd310). (At Hearing)**

First Name: Barry

Last Name: Wallerstein

Email Address: Non-web submitted comment

Affiliation:

Subject: South Coast AQMD

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/cpmthd310/199-barry.pdf](http://www.arb.ca.gov/lists/cpmthd310/199-barry.pdf)

Original File Name: Barry.pdf

Date and Time Comment Was Submitted: 2009-10-06 10:00:20

No Duplicates.

## **Comment 1 for Consumer Products Test Method 310 (cpmthd310) - 15-1.**

First Name: Steve

Last Name: Bunting

Email Address: sbunting@nbfd.net

Affiliation: So Cal Fire Prevention Officers

Subject: Proposed Modified Regulatory Language (1/14/10)

Comment:

Title 17, CCR, section 94512(e): No objection to the changes.  
Strongly agree with the addition of the Spanish text in subsection  
2, A and B.

Title 17, CCR, section 94508(a): No objections to the changes to  
the definitions.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-01-14 14:46:55

No Duplicates.

## **Comment 2 for Consumer Products Test Method 310 (cpmthd310) - 15-1.**

First Name: Leslie

Last Name: Berry

Email Address: Leslie\_Berry@americanchemistry.com

Affiliation:

Subject: American Chemistry Council Comments

Comment:

American Chemistry Council's Solvents Industry Group Comments

Attachment: [www.arb.ca.gov/lists/cpmthd310/203-sig\\_\\_\\_cp\\_15\\_daycomments\\_final.pdf](http://www.arb.ca.gov/lists/cpmthd310/203-sig___cp_15_daycomments_final.pdf)

Original File Name: SIG \_ CP 15 dayComments final.pdf

Date and Time Comment Was Submitted: 2010-01-29 12:07:45

No Duplicates.



### **Comment 3 for Consumer Products Test Method 310 (cpmthd310) - 15-1.**

First Name: Joseph

Last Name: Yost

Email Address: jyost@cspa.org

Affiliation: Consumer Specialty Products Association

Subject: 15-Day Notice - Modifications to Text of Proposed 2009 Amendments

Comment:

Attached, please find the Consumer Specialty Products Association's (CSPA's) comments on the ARB's 15-Day Notice issued pursuant to Board Resolution 09-51, as approved at the public hearing held on September 24, 2009. CSPA appreciates the opportunity to participate in the ARB's open and transparent public process to develop the 2009 Amendments to California's very comprehensive Consumer Products Regulation.

Attachment: [www.arb.ca.gov/lists/cpmthd310/204-cspa\\_comments\\_on\\_arb\\_15-day\\_notice\\_-\\_modified\\_text\\_of\\_2009\\_amendments.pdf](http://www.arb.ca.gov/lists/cpmthd310/204-cspa_comments_on_arb_15-day_notice_-_modified_text_of_2009_amendments.pdf)

Original File Name: CSPA Comments on ARB 15-Day Notice - Modified Text of 2009 Amendments.pdf

Date and Time Comment Was Submitted: 2010-01-29 12:24:05

No Duplicates.

## **Comment 4 for Consumer Products Test Method 310 (cpmthd310) - 15-1.**

First Name: Heidi  
Last Name: McAuliffe  
Email Address: hmcauliffe@paint.org  
Affiliation: American Coatings Association

Subject: Comments on 15 Day Notice Consumer Products  
Comment:

January 29, 2010

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

Subject: Comments to ARB's 15 Day Notice of Modified Text to 2009 Amendments

Dear Members of the Air Resources Board:

The American Coatings Association appreciates the opportunity to comment on the California Air Resources Board's (ARB's) 15-Day Notice of Public Availability of Modified Text for the Public Hearing to Consider Proposed Amendments to the California Consumer Products Regulation.

The American Coatings Association (ACA) is a voluntary, nonprofit trade association working to advance the needs of the paint and coatings industry and the professionals who work in it. The organization represents paint and coatings manufacturers, raw materials suppliers, distributors, and technical professionals. ACA serves as an advocate and ally for members on legislative, regulatory and judicial issues, and provides forums for the advancement and promotion of the industry through educational and professional development services.

After reviewing the changes in the 15 Day Notice, the ACA has the following comment.

The proposed definition of the aromatic compound (13) is in conflict with the current definition for (94) LVP-VOC and should be reconciled to the current regulatory definition.

The current definition of LVP-VOC is as follows:  
"LVP-VOC" means a chemical "compound" or "mixture" that contains at least one carbon atom and meets one of the following:  
(A) has a vapor pressure less than 0.1 mm Hg at 20°C, as determined by ARB Method 310; or  
(B) is a chemical "compound" with more than 12 atoms, or a

chemical "mixture" comprised solely of "compounds" with more than 12 carbon atoms, as verified by formulation data, and the vapor pressure and boiling point are unknown; or  
(C) is a chemical "compound" with a boiling point greater than 216°C, as determined by ARB Method 310; or  
(D) is the weight percent of a chemical "mixture" that boils above 216°C, as determined by ARB Method 310.

For the purpose of the definition of LVP-VOC, chemical "compound" means a molecule of definite chemical formula and isomeric structure, and chemical "mixture" means a substance comprised of two or more chemical "compounds."

The current definition of aromatic compound is as follows:  
"Aromatic Compound" means a carbon containing compound that contains one or more benzene or equivalent heterocyclic rings and has an initial boiling point less than or equal to 280°C. "Aromatic Compound" does not include compounds excluded from the definition of Volatile Organic Compound (VOC) in this Section 94508(a).  
The two definitions are clearly in conflict with each other and should be reconciled to the current regulatory definition.

We are aware that the National Aerosol Association (NAA) and the Consumer Specialty Products Association (CSPA) has proposed solutions for this inconsistency. ACA recognizes the importance of the LVP-VOC exemptions and wants to make sure that the regulatory language proposed in this rulemaking does not jeopardize this concept. ACA supports reconciliation of this language in order to ensure that the definition of "Aromatic compound" does not include compounds defined as LVP-VOC. Both NAA and CSPA's proffered solution will accomplish this.

ACA appreciates the opportunity to submit this comment. If you have any questions, please do not hesitate to contact me.

Best regards,

Heidi K. McAuliffe, Esq.  
Counsel, Government Affairs

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-01-29 16:11:47

No Duplicates.

**Comment 5 for Consumer Products Test Method 310 (cpmthd310) - 15-1.**

First Name: Michael S.

Last Name: Cooley

Email Address: Non-web submitted comment

Affiliation:

Subject: BARR

Comment:

please see attached.

Attachment: [www.arb.ca.gov/lists/cpmthd310/208-cooley.pdf](http://www.arb.ca.gov/lists/cpmthd310/208-cooley.pdf)

Original File Name: Cooley.pdf

Date and Time Comment Was Submitted: 2010-02-04 15:10:44

No Duplicates.

## **Comment 6 for Consumer Products Test Method 310 (cpmthd310) - 15-1.**

First Name: Douglas

Last Name: Raymond

Email Address: [djraymond@reg-resources.com](mailto:djraymond@reg-resources.com)

Affiliation:

Subject: National Aerosol Association

Comment:

please see attached

Attachment: [www.arb.ca.gov/lists/cpmthd310/209-doug.pdf](http://www.arb.ca.gov/lists/cpmthd310/209-doug.pdf)

Original File Name: Doug.pdf

Date and Time Comment Was Submitted: 2010-03-02 15:41:15

No Duplicates.