



PRODUCTS CORPORATION

Home Office: PO Box 737, Norristown, PA 19404
Phone 800 543-7710 FAX: 610 277-4390 www.sprayproducts.com

Manufacturing Plants:

1323 Conshohocken Road
Plymouth Meeting, PA 19462

2 Race Street
Upland, PA 19015

West Coast Warehouse:

5464 East Hedges Avenue
PO Box 7709
Fresno, CA 93747
800 962-5476
FAX: 559 252-5005

April 30, 2018

To: Clerk of the Board
Cc: Dan Garrett
Ravi Ramalingam
Joe Calavita
Jose Gomez

Subject: Multi-purpose Lubricant Amendments

Spray Products Corporation appreciates the opportunity to comment on the Amendments to the Consumer Products Regulation. These amendments include changes to the category of Multi-purpose lubricants future effective limit.

Spray Products is a marketer and custom filler of many aerosol and liquid products sold to consumers and commercial operations. Spray Products has been in business for over eighty years. We employ 110 people at our manufacturing location in Pennsylvania and two people at our distribution warehouse located in Fresno, California. Spray Products has maintained a manufacturing and/or warehousing presence in California for over 30 years.

Spray Products supports the staff proposal of a product weighted Maximum Incremental Reactivity (MIR) limit of 0.45 with a maximum VOC level of 25%. The use of the Concept of Reactivity in the reduction of ozone formation is sound science. The Aerosol Coating Regulation that CARB developed almost two decades ago has proven this. The reduction in an MIR level in a product always results in an ozone reduction. This is not the case for Mass based regulations. Thus CARB staff should consider Reactivity options for more Consumer Products.

Section 94509 (a)

Comment: Spray Products supports the extension of the effective date to 7/1/2019. This will provide the manufacturers time to comply with the amendments.

Section 94513(h)(1)

The Responsible Party must report annual sales to the Executive Officer no later than March 31. The annual reporting requirement shall sunset on April 1, 2023.

Comment: Spray Products supports the sunset of the annual reporting.

Conclusion

Spray Products Corporation supports the staff's proposal on the Alternative option for MPL's. The staff worked hard on this proposal and used innovative thinking by adding Reactivity to the option. The emission reductions will be maintained and Industry will have more flexibility to produce effective products. Truly a win-win situation.

Any questions or comments feel free to contact our consultant Doug Raymond at 740-936-8120 or by e-mail at djraymond@me.com.

Sincerely,

A.Bart Bastian, President