



american cleaning institute<sup>SM</sup>  
for better living

August 16, 2010

Via Electronic Mail  
Mr. Nicholas Berger  
Stationary Source Division  
Air Resources Board  
1001 I Street  
P.O. Box 2815  
Sacramento, CA 95812

Dear Mr. Berger:

The American Cleaning Institute<sup>SM</sup> (ACI) appreciates the opportunity to comment on Air Resources Board's (ARB's) proposed amendments to the *Regulation for Reducing Emissions from Consumer Products* and revisions to Test Method 310 where it applies to the measurement for volatile organic compounds (VOCs) per dryer sheet. ACI is the national trade association representing manufacturers of household, industrial and institutional cleaning products; their ingredients; and finished packaging. ACI members produce more than 90% of the cleaning products marketed in the U.S. ACI membership includes companies with operations both inside and outside of California. Therefore, ACI members have a significant interest in ARB proposals affecting its product categories.

Proposed Amendments to the Regulation for Reducing Emissions from Consumer Products  
VOC limit for General Purpose Cleaner (non-aerosol)

ACI is concerned with both the proposed new VOC limit and its effective date. The current proposed limit of 0.5% is technically challenging for some cleaners and could affect their efficacy. The proposed effective date poses issues, especially for formulators with products with antibacterial claims who will have to re-register new formulations with US EPA under FIFRA. ACI recommends that ARB reconsider both the limit and effective date.

*Consumer Products Labeling Requirements*

The proposed labeling scheme is of concern to ACI members. The proposed label language will crowd an already full label which could inhibit consumers from reading the safety information for use, storage and disposal. Stamping this information to the bottom of the product's container is also problematic; most manufacturers include the recycling information on the bottom of their product's package. Including the VOC information has the potential to confuse consumers, especially on those products sold outside of California which may also carry the VOC compliant language. A large burden will be placed on industry, especially small and medium enterprises (SMEs) whose narrow margins will be furthered tightened by requiring labeling. There is the

initial cost in designing and affixing new labels to products, but there are also long-term cost considerations. Manufacturers will need to restructure their distribution networks in order to ensure that the VOC labeled products are sold in California. There will be costs associated with enhanced oversight to ensure compliance with the new labeling scheme, and finally there may be additional costs in educating California consumers as to the meaning of the new label information. ARB staff will also be affected. For ARB, considerable resources would be needed to review and assess the information as outlined in § 94513, *Reporting Requirements*, from the standpoint of quality. An analysis of the impact on air quality should be conducted and made available for public review prior to the initiation of any VOC labeling program to ensure that the burdens imposed on business and government result in meaningful impacts on air quality.

*Proposed Amendments to Method 310 for Determining Total Grams of Volatile organic Compounds per Dryer Sheet*

ACI is concerned that the methodology and calculations for determining the VOC content for single use dryer sheets is inaccurate. The moisture content of the non-woven dryer sheet is not taken into account. This will increase the weight difference in drying, thus artificially increase the total grams VOC. ACI also recommends that ARB increase the transparency of their methods by including the calculations for correcting for non-VOCs, low vapor pressure (LVP) VOCs, and exempt compounds.

We recommend the following revisions to Section 7:

7.1 Data Summary

7.1.1 A = Weight of empty aluminum dish to the nearest 0.1 mg, as determined by Section 5.2.

7.1.2 B = Weight of single dryer sheet to the nearest 0.1 mg, as determined by Section 5.3.

7.1.3 C = Weight of dryer sheet circle to the nearest 0.1 mg, as determined by Section 5.4.

7.1.4 D = Weight of cooled aluminum dish with sample residue to the nearest 0.1 mg, as determined by Section 5.5.

7.1.5 E = Weight of Moisture

7.1.6 F = Weight of low vapor pressure compounds

7.1.7 G = Weight of exempt compounds

7.2 Equations

7.2.1 Weight (g) of Dryer Sheet Sample = [C]

7.2.2 Weight (g) of Residue = [D] – [A]

$$7.2.3 \text{ Total Volatile Sample, weight fraction} = \frac{C-(D-A-E-F-G)}{[C]}$$

$$7.2.4 \text{ Total Grams VOC per sheet} = \frac{C-(D-A-E-F-G) \times [B]}{[C]}$$

ACI is aware that a laboratory round robin was conducted to test the method which manufacturers of these products have not had the opportunity to review. ACI requests that data from the round robin testing be made publicly available for review and comment.

We hope this is helpful as ARB further considers regulatory proposals and we offer our assistance in further improving the information base on products.

Sincerely,

*Kathleen Stanton*

Kathleen Stanton  
Associate Director, Scientific Affairs

cc: Ms. Janette Brooks, Chief, Air Quality Measures Branch, Air Resources Board  
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