

Public Webinar for Proposed Amendments to the Consumer Products Regulations

April 14, 2020 9:00am-12:00pm



Today's Meeting

Webinar Registration

(<https://attendee.gotowebinar.com/register/1500434654682248716>)

To participate by phone:

TELEPHONE: (951) 384-3421

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Presentation Outline

- ❖ Overview and Background
- ❖ Draft Regulatory Proposals for VOC Reductions
 - Q & A
- ❖ Other Topics
- ❖ Next Steps
 - Q & A

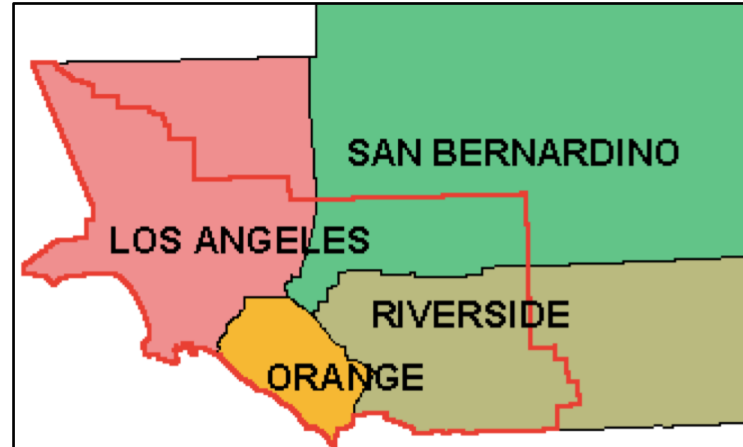
For Q & A: Please type in questions or comments using the 'Questions' tab on the webinar sidebar.

Overview and Background

- ❖ California Clean Air Act requires CARB to regulate consumer products
 - Achieve the maximum feasible volatile organic compound (VOC) reduction from consumer products
 - Regulations must be technologically and commercially feasible
 - Must not eliminate a product form
- ❖ Manufacturer innovation has enabled low-emission products
- ❖ More needed to meet federal air quality standards

VOC Reduction Commitments

By 2023:
1-2 tpd in South Coast



By 2031:
4-5 tpd in South Coast
8-10 tpd Statewide

Regulatory Development Summary

Date	Event
2014 - 2018	Consumer Products Survey: Build Technical Foundation
April 12, 2019	1st Public Workshop: Identified 49 Priority Categories
May - July	Eleven work group meetings to evaluate 49 initial priority survey categories. Eliminated 32 categories from further evaluation.
September - October	Three work group meetings to evaluate most promising remaining 17 survey categories, fragrance, HFC-152a.
July 17 and October 4	Two Regulatory Definition Work Group meetings
November 7, 2019	2nd Public Workshop: Draft Proposed Strategies

Regulatory Development Summary (cont.)

Date	Event
February 26, 2020	Public Work Group Meeting #16: <ul style="list-style-type: none">• Industrial and Institutional Product• Energized Electrical Cleaner• ACP and IPE Eligibility Criteria• Label Definition: Web-Based Product Claims
March 10, 2020	Public Work Group Meeting #17: <ul style="list-style-type: none">• Hair Care Category Definitions• Evaluation of Hair Shine and Temporary Hair Color• Manual Aerosol Air Freshener Definitions• Personal Fragrance Product Fragrance Content• Two-Percent Fragrance Exemption
Ongoing	Meetings with industry representatives, trade associations, NGOs, and other interested stakeholders
Today	Public Webinar: Updated draft regulatory proposals

Draft Regulatory Proposal

- ❖ Manual Aerosol Air Fresheners
- ❖ Crawling Bug Insecticide
- ❖ Hair Care Products
 - Hair Finishing Spray
 - Dry Shampoo
 - Hair Shine
 - Temporary Hair Color
- ❖ Personal Fragrance Products
- ❖ Sunset Fragrance Exemption

Revised Proposal Summary

Category	Existing Standard	Proposed Standard ²	2023 Reductions		Proposed Standard ³	2031 Reductions	
			CA	SCAB		CA	SCAB
Manual Aerosol Air Freshener ¹	20% or 30%	10%	1.07	0.45	5%	1.73	0.72
Hair Finishing Spray	55%	50%	0.98	0.41	45%	2.55	1.06
No Rinse Shampoo	NA	55%	0.61	0.25	45%	0.89	0.37
Hair Shine	55%	55%	NA	NA	45%	0.02	0.01
Temporary Hair Color	55%	55%	NA	NA	45%	0.05	0.02
Personal Fragrance Products (≤ 10% Fragrance)	75%	68%	0.82	0.34	50%	5.18	2.15
Aerosol Crawling Bug Insecticide	15%	15%	NA	NA	6%	1.09	0.44
2% Fragrance Exemption	2% of product mass exempted	NA	NA	NA	Sunset Exemption	0.33	0.13
Total			3.5	1.4		11.8	4.9

1 – ‘Concentrated Aerosol Air Freshener’ and ‘Total Release Air Freshener’ subject to alternate standards on slide 11.

2 – Proposed standards apply January 1, 2023.

3 – Proposed standards apply between January 1, 2027 and January 1, 2031, depending upon category.

Emission reductions for 2031.



Manual Aerosol Air Freshener

Manual Aerosol Air Freshener Draft Proposal

- ❖ Combine single and double phase aerosol air freshener into “Manual Aerosol Air Freshener”
 - 10% VOC Standard by 2023, 5% VOC Standard by 2027
- ❖ Create three new aerosol air freshener categories:
 - “Automatic Aerosol Air Freshener” retains 30% standard
 - “Concentrated Aerosol Air Freshener”: 15% VOC by 2023, 5% VOC by 2031
 - “Total Release Air Freshener”: 25% VOC by 2025

Draft Potential Air Freshener Definition Updates

Section 94508(a)(6)

For products manufactured on or after January 1, 2023, “Air Freshener” includes the following subcategories (A-E):

- (A) “Automatic Aerosol Air Freshener” is an aerosol “Air Freshener” that is labeled to be used exclusively in an Automatic Air Freshening Dispenser.”
- (B) “Dual Purpose Air Freshener/Disinfectant” means an aerosol “Air Freshener” that is designed or labeled for use as both a “Disinfectant” and an “Air Freshener,” or is so represented on any sticker, label, packaging, or literature attached to the product container.
- (C) “Manual Aerosol Air Freshener” means an aerosol “Air Freshener,” that is not an “Automatic Aerosol Air Freshener” or a “Dual Purpose Air Freshener/Disinfectant”

(subsections D and E on next slide)

Section 94508(a)(17)

(17) “Automatic Air Freshening Dispenser” is a device labeled to dispense product at a pre-determined time or interval of time, under preset conditions, or due to sensor-activation.

Draft Potential Air Freshener Definition Updates(cont.)


Section 94508(a)(6)

For products manufactured on or after January 1, 2023, “Air Freshener” includes the following subcategories: ...

(subsections A through C on previous slide)

(D) “Concentrated Aerosol Air Freshener” is a “Manual Aerosol Air Freshener” enclosed under pressure which (1) contains 15% or more fragrance, (2) is designed with a valve that permits the dispensing of no more than 185 microliters of product upon each activation, and (3) is sold in aerosol containers of two ounces or less by weight.

(E) “Total Release Air Freshener” is an aerosol air freshener product enclosed under pressure which (1) dispenses all or most of its contents during a single application, and (2) is sold in containers of five ounces or less by weight.



Aerosol Crawling Bug Insecticide

Aerosol Crawling Bug Insecticide

- ❖ Eliminate draft proposed 10% VOC standard by 2023 due to registration requirements under FIFRA
- ❖ 6% VOC standard would apply January 1, 2029 in response to product manufacturer feedback
 - Appears feasible for quick kill products with both higher and lower residual protection
- ❖ No definition changes proposed



Hair Care Products

Hair Finishing Spray

Dry Shampoo

Hair Shine

Temporary Hair Color

Hair Styling Product (definition only)

Need for Uniform Hair Care Product Category VOC Standards



* For illustrative purposes only. Not to exact scale.

Hair Care Products

Hair Finishing Spray

- ❖ Retain existing proposal for 50% VOC standard by 2023
- ❖ Additional two years to meet 45% standard (by 2029)
- ❖ Continuing technical discussions with stakeholders
- ❖ Propose definition update to further specify that “Hair Finishing Spray” is applied once all styling is complete

Potential Hair Finishing Spray Definition Update

~~“Hair Finishing Spray” means a consumer product that is designed or labeled for application to styled hair to provide sufficient rigidity, to hold, retain or finish the style of the hair for a period of time once styling is complete, .~~ “Hair Finishing Spray” and includes aerosol hair sprays, pump hair sprays, spray waxes; color, glitter, or sparkle hair spray Products that make finishing claims; and products that are labeled for both a hair styling and finishing product. “Hair Finishing Spray” does not include ~~spray products labeled for hair that are intended to aid in styling but do not provide~~ labeled for finishing of a the hair style.

For the purposes of this subchapter, “finish” or “finishing” means the maintaining and/or holding of ~~previously styled hair for a period of time~~ a hairstyle once all styling is complete.

For the purposes of this subchapter, “styling” means ~~the~~ forming, sculpting, or manipulating the hair to ~~temporarily~~ alter the hair's shape.

Potential Hair Finishing Spray Definition Update (clean version)

“Hair Finishing Spray” means a product that is labeled for application to hair once styling is complete, and includes products that are labeled for both styling and finishing. “Hair Finishing Spray” does not include products labeled for hair styling but not labeled for finishing the hair style.

For the purposes of this subchapter, “finish” or “finishing” means the maintaining and/or holding of a hairstyle once all styling is complete.

For the purposes of this subchapter, “styling” means forming, sculpting, or manipulating the hair to alter the hair's shape.

Hair Care Products

Dry Shampoo

- ❖ Adjust VOC standard proposed for 2023 from 50% to 55%
- ❖ Additional two years to meet 45% standard (until 2029)
- ❖ Continuing technical discussions with stakeholders
- ❖ Propose definition update to better characterize and differentiate 'Dry Shampoo' product

Potential Dry Shampoo Definition Update

~~“No Rinse Shampoo”~~Dry Shampoo means a product ~~designed or~~ labeled ~~solely to be applied to~~ dry hair ~~that is dry to~~ clean, absorb oil, or eliminate odor, and ~~is to~~ subsequently be removed from the hair by combing, brushing, or toweling the hair.

Note: Leave-in conditioners that make styling claims are currently included in the definition of “Hair Styling Products.” CARB staff intent is that this would continue to apply.

As described later in this presentation, staff are also evaluating whether to simplify how ‘Hair Shine’ products that make conditioning claims are categorized.

Hair Care Products

Temporary Hair Color

Definition and Regulatory History

“‘Temporary Hair Color’ means any products that applies color, glitter, or UV-active pigments to hair, wigs, or fur and is removable when washed. ‘Temporary Hair Color’ includes hair color mousses and products labeled to add texture or thickness to cover thinning/balding areas. ‘Temporary Hair Color’ does not include ‘Hair Finishing Spray,’ ‘Hair Styling Product,’ or ‘Hair Mousse.’”

- ❖ 55% VOC Standard applicable on December 31, 2010
- ❖ CARB technical evaluation at March 10, 2020
Public Work Group meeting

Hair Care Products

Temporary Hair Color

- ❖ Propose 45% VOC standard by January 1, 2029
 - Harmonize with proposed “Hair Finishing Spray”, “Dry Shampoo”, and “Hair Shine” standards by 2029.
- ❖ Continuing technical discussions with stakeholders
- ❖ No definition updates proposed at this time

Hair Care Products

Hair Shine

Definition and Regulatory History

“‘Hair Shine’ means any products labeled for the primary purpose of creating a shine when applied to the hair. ‘Hair Shine’ includes, but is not limited to, dual-use products designed primarily to impart a sheen to the hair. ‘Hair Shine’ does not include ‘Hair Finishing Spray,’ ‘Hair Mousse,’ ‘Hair Styling Product,’ or products whose primary purpose is to condition or hold the hair.”

- ❖ 55% VOC Standard applicable on January 1, 2005
- ❖ CARB technical evaluation at March 10, 2020
Public Work Group meeting

Hair Care Products

Hair Shine

- ❖ Propose 45% VOC standard by January 1, 2029
 - Harmonize with proposed “Hair Finishing Spray”, “Dry Shampoo”, and “Temporary Hair Color” standards by 2029.
 - Most existing products meet proposed standard
- ❖ Propose definition update to clarify that Hair Shine can make conditioning claims even if its primary purpose is not to condition or hold the hair

Potential Hair Shine Definition Update

~~‘Hair Shine’ means any products designed~~ labeled for the primary purpose of creating a shine when applied to the hair. ‘Hair Shine’ includes, but is not limited to, dual-use products designed primarily to impart a sheen to the hair. ‘Hair Shine’ does not include ‘Hair Finishing Spray,’ ‘Hair Mousse,’ or ‘Hair Styling Product.’ ~~or products whose primary purpose is to condition or hold the hair.~~

Hair Care Products

Hair Styling Product

- ❖ No new VOC Standard proposed
- ❖ Definition update for consistency with proposed “Hair Finishing Spray” and “Dry Shampoo” definition changes

Potential Hair Styling Product Definition Update

“Hair Styling Product” means a consumer product that is designed or labeled for the application to wet, damp or dry hair to aid in defining, shaping, lifting, styling and/or sculpting of the hair. “Hair Styling Product” includes, but is not limited to hair balm, clay, cream, creme, curl straightener, gel, liquid, lotion, paste, pomade, putty, root lifter, serum, spray gel, stick, temporary hair straightener, wax, spray products that aid in styling but do not provide finishing of a hair style, and leave-in volumizers, detanglers and/or conditioners that make styling claims. “Hair Styling Product” does not include “~~No Rinse~~ Dry Shampoo,” “Thermal Protectant,” “Hair Mousse,” “Hair Shine,” “Hair Finishing Spray,” or shampoos or conditioners that are rinsed from the hair prior to styling.

For the purposes of this subchapter, “finish” or “finishing” means the maintaining and/or holding of ~~previously styled hair for a period of time~~ a hairstyle once all styling is complete.

For the purposes of this subchapter, “styling” means ~~the~~ forming, sculpting, or manipulating the hair to ~~temporarily~~ alter the hair's shape.



Personal Fragrance Products

Personal Fragrance Products

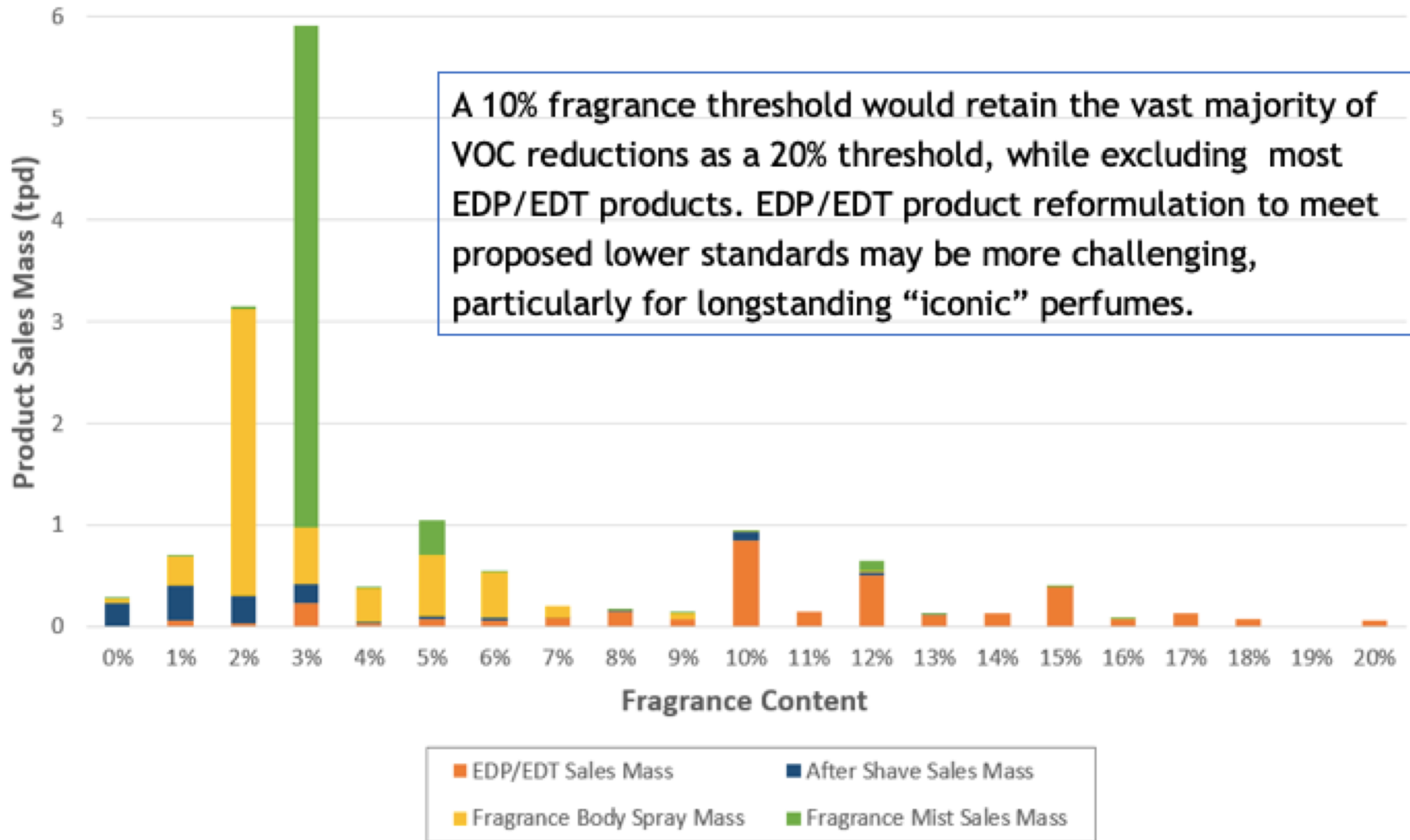
- ❖ Propose reducing applicable fragrance content from 20% to 10%. Products with $\leq 10\%$ fragrance:
 - Proposed 68% VOC standard by January 1, 2023
 - Proposed 50% VOC standard effective January 1, 2027
- ❖ Lower fragrance threshold helps address reformulation challenges for Eau de Parfum and Eau de Toilette products

Fragrance Content	VOC Emissions (2015 tpd)	Existing VOC Standard	Proposed VOC Standards
$\leq 10\%$	12.61	75%	68% (2023) 50% (2027)
10% to $\leq 20\%$	1.92		75%
$> 20\%$	0.20	65%*	

* Includes products grandfathered at 80% VOC content.

Draft Evaluation of Personal Fragrance Product with less than 20% Fragrance

Subcategory Product Sales Mass per Fragrance Content





2% Fragrance Exemption Sunset

Two-Percent Fragrance Exemption

- ❖ Sunset would promote transparency and equity, facilitate enforcement, and help address public health concerns
- ❖ Proposing to extend sunset date by four years (to 2031)
- ❖ Over 85% of products and product mass not using exemption
 - For more information, see [March 10, 2020 Public Work Group presentation](https://ww2.arb.ca.gov/our-work/programs/consumer-products-program/regulatory-activity-workshops-meetings) (<https://ww2.arb.ca.gov/our-work/programs/consumer-products-program/regulatory-activity-workshops-meetings>)
- ❖ Would allow additional flexibility for non-aerosol General Purpose Cleaners and General Purpose Degreasers (GPC/GPD)

Two-Percent Fragrance Exemption

General Purpose Cleaners and Degreasers (GPC/GPD)

- ❖ 0.25% of monoterpenes in non-aerosol GPC/GPD would be allowed as part of 2% fragrance exemption beginning in 2023
- ❖ Non-aerosol GPC/GPD retain 0.25% fragrance exemption in 2031 (inclusive of monoterpenes)
- ❖ CARB staff welcomes feedback regarding other categories

For More Information

Work Group Meeting	1 st Meeting	2 nd Meeting	3 rd Meeting
Manual Aerosol Air Freshener	5/28/2019	10/17/2019	3/10/2020
Hair Finishing Spray	5/20/2019	10/10/2019	3/10/2020
Dry Shampoo	5/20/2019	10/10/2019	3/10/2020
Temporary Hair Color	3/10/2020		
Hair Shine	3/10/2020		
Personal Fragrance Products	6/25/2019	10/10/2019	3/10/2020
Crawling Bug Insecticide	7/2/2019	10/17/2019	
Two-Percent Fragrance Exemption	9/20/2019	11/7/2019	3/10/2020

[CARB Consumer Products Regulatory Amendments webpage](https://ww2.arb.ca.gov/our-work/programs/consumer-products-program/regulatory-activity-workshops-meetings) (<https://ww2.arb.ca.gov/our-work/programs/consumer-products-program/regulatory-activity-workshops-meetings>)



Discussion & Questions

For webinar attendees: Please type in questions or comments using the Questions tab on the sidebar



Other Topics

Maximum Incremental Reactivity Table

Section 94700: MIR Values for Compounds

- ❖ Propose adding three MIR values to Section 94700 based upon stakeholder feedback:
 - 1-Chloro-3,3,3-Trifluoropropene (HFO-1233zd)
 - Alkane Mixed - Minimally 90% C13 and higher carbon number
 - Diethyl Carbonate
- ❖ Would provide additional flexibility for these low reactive substances

Compressed Gas Propellants

- ❖ Looking at ways the regulation can incentivize the use of compressed gas propellants (nitrogen, carbon dioxide, compressed air) over liquified gas propellants (hydrocarbons, HCFCs) where feasible
- ❖ There are opportunities within the regulation to achieve emissions benefits through the use of compressed gasses, but these opportunities vary by formulation and by category
- ❖ Considering potential to update the IPE process to encourage the replacement of liquified gas propellants with compressed gas propellants

Existing Prohibition on use of Toxic Air Contaminants

- ❖ Trichloroethylene
- ❖ Methylene Chloride
- ❖ Perchloroethylene
- ❖ Product Categories are listed in Table 94508(m)(1)

Chlorinated Solvents Prohibition in Regulated Categories

- ❖ Propose prohibition on use of Methylene Chloride, Perchloroethylene, and Trichloroethylene in:
 - Manual Aerosol Air Freshener
 - Hair Finishing Spray
 - No Rinse Shampoo
 - Hair Shine
 - Temporary Hair Color (aerosol)
 - Personal Fragrance Product with 10% or less fragrance
 - Aerosol Crawling Bug Insecticide
- ❖ Negligible usage for these categories
- ❖ Pre-empts any potential for increase, consistent with previous rulemakings

Parachlorobenzotrifluoride (1-Chloro-4-(trifluoromethyl)benzene or PCBTF)

- ❖ Currently Exempt VOC by U.S. EPA and CARB
- ❖ California Office of Environmental Health Hazard Assessment expected to finalize a Cancer Inhalation Unit Risk Factor this Summer
- ❖ CARB may consider to prohibit use of PCBTF in categories identified in previous slide

Energized Electrical Cleaner

- ❖ Responsible for over 75% of perchloroethylene and 50% of trichloroethylene emissions from consumer products
- ❖ Product sales at automotive supply retailers suggest usage as automotive clean-up solvent → excess toxic emissions
- ❖ Proposed definition changes to restrict off-label usage, reduce toxic emissions and community health risk

Energized Electrical Cleaner Proposed Definition Update

Consumer Product Regulation, Section 94508(a):

(39) “Energized Electrical Cleaner” means an “Electrical Cleaner” product that meets ~~both~~ all three of the following criteria:

- 1) the product is labeled to clean and/or degrease electrical equipment, where cleaning and/or degreasing ~~is accomplished~~ can only be performed when electrical current exists, or when there is a residual electrical potential from a component such as a capacitor;
- 2) the product label clearly displays the statements: “Energized Equipment use only. Not to be used for motorized vehicle maintenance, or their parts.”
- 3) the product is exclusively sold directly or through distributors to establishments which operate or maintain energized electrical equipment. Sales to automotive repair establishments are prohibited.

Energized Electronic Cleaner Proposed Definition Update

Consumer Product Regulation, Section 94508(a):

(40) “Energized Electronic Cleaner” means an “Electronic Cleaner” product that meets all three of the following criteria:

- 1) the product is labeled to clean and/or degrease electronic equipment, where cleaning and/or degreasing can only be accomplished when electrical current exists or when there is a residual electrical potential from a component such as a capacitor;
- 2) the product label clearly displays the statements: “Energized Electronic Equipment use only. Not to be used for motorized vehicle maintenance, or their parts.”
- 3) the product is exclusively sold directly or through distributors to establishments which operate or maintain energized electronic equipment. Sales to automotive repair establishments are prohibited.

Alternative Control Plan (ACP)

- ❖ Enable manufacturers to reformulate products below a given standard to offset other product excess emissions
 - Intended to encourage innovation while providing compliance flexibility
- ❖ Significant increase in ACP products barely below the applicable standard
 - Pose enforcement and administrative challenges
 - Questionable air quality benefits
- ❖ Propose an ACP product be more than a de minimis percent below the applicable standard to generate offsets

Alternative Control Plan (ACP) Proposed Eligibility Criteria

- ❖ Mirror U.S. EPA Certified Limit requirements for FIFRA products found in 40 CFR 158.350
 - Flexibility for low VOC products
 - Helps address enforcement and administrative concerns
 - Vast majority of existing VOC products remain eligible

Applicable VOC Standard	ACP Eligibility Criteria (Percent of Applicable Standard)
$20 < N \leq 100\%$	97%
$1 < N \leq 20\%$	95%
$N \leq 1\%$	90%

Innovative Product Exemption (IPE)

- ❖ Clarify that combustion products are ineligible (due to potential increase in non-VOC pollutants)

Proposed Eligibility Criteria

Section 94511(c):

A consumer product which reduces VOC emissions relative to the representative consumer product due to VOC combustion (including, but not limited to, catalytic combustion) shall be ineligible for an exemption provided per section 94511(a).

Web-Based or Other Product Claims

- ❖ Products increasingly marketed and sold over the internet
 - Physical product label may no longer be primary source of consumer information
- ❖ Inconsistency between manufacturer product label and internet claims results in:
 - Increased emissions due to product off-label usage
 - Unlevel playing field
- ❖ Propose two regulatory definition updates:
 - More holistic definition of product label to include a manufacturer's internet and other claims
 - Update to 'most restrictive limit' criteria

Web-Based or Other Product Claims

Draft Proposed Definition Update

Consumer Product Regulation, Section 94508(a):

(78) “Label” means any written, printed, or graphic matter affixed to, applied to, attached to, blown into, formed, molded into, embossed on, referenced on, or appearing upon, or connected with any consumer product or consumer product package, for purposes of branding, identifying, or giving information with respect to the product or to the contents of the package.

(79) “Labeled” means all labels and other written, printed, video, graphic, or other materials: 1) that accompanies or is referenced by or on the product, 2) that is part of or connected with the product’s marketing, and controlled, directly or indirectly, by the manufacturer, and 3) that is referenced on the label or in literature with or on the product, including but not limited to any reference whatsoever to a website.

Web-Based or Other Product Claims

Draft Proposed 'Most Restrictive Limit' Update

Consumer Product Regulation, Section 94512(a):

(3) Where a manufacturer's claims regarding a product differ across different materials, such as between the label and the website, the product shall fall into the product category with the most stringent limit for the claims made in any of the materials.

(4) Product claims or other information must be found on the physical product label to exempt a product from a regulated category with a more stringent VOC limit.

For More Information

For more information regarding CARB draft proposals for:

- ❖ Energized Electrical Cleaner Definition;
- ❖ ACP and IPE Eligibility Criteria; or
- ❖ Web-Based or Other Product Claims

See [February 26, 2020 Public Work Group meeting discussion document](https://ww2.arb.ca.gov/our-work/programs/consumer-products-program/regulatory-activity-workshops-meetings) (<https://ww2.arb.ca.gov/our-work/programs/consumer-products-program/regulatory-activity-workshops-meetings>)

- ❖ CARB staff welcome stakeholder feedback regarding these draft proposals, including alternate potential approaches or regulatory language

Next Steps

- ❖ Ongoing: Meet with interested stakeholders
- ❖ April 20, 2020 Webinar: Test Method 310 and Associated Consumer Products Regulations
 - [Register for Webinar](https://ww2.arb.ca.gov/our-work/programs/consumer-products-program/regulatory-activity-workshops-meetings) (<https://ww2.arb.ca.gov/our-work/programs/consumer-products-program/regulatory-activity-workshops-meetings>)
- ❖ Spring - Mid-2020: Additional public meetings to further refine regulatory proposals
- ❖ Late 2020: Proposed regulatory amendments for Board consideration

Consumer Products Program Regulatory Development Staff

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Hair Finishing Spray	Barbara Zavala	Barbara.Zavala
Dry Shampoo	Barbara Zavala	Barbara.Zavala
Hair Shine	Maryana Visina	Maryana.Visina
Temporary Hair Color	Lucy Negrete	Lucy.Negrete
Personal Fragrance Products	Robert Barrera	Robert.Barrera
Aerosol Crawling Bug Insecticide	Narci Gonzalez	Narci.Gonzalez
Fragrance Exemption Sunset	Josh Berghouse	Josh.Berghouse
Chlorinated Solvents Prohibition	Nicholas Berger	Nicholas.Berger
Table of MIR Values	Irina Malkina	Irina.Malkina
Energized Electrical Cleaner Definition	Josh Berghouse	Josh.Berghouse
ACP and IPE Eligibility Criteria	Joe Calavita	Joe.Calavita
Web-Based Product Claims		Josh.Berghouse



**Please provide comments by May 14th to:
csmrprod@arb.ca.gov**

Comments should be in ADA-compliant format (or in MS Word) if intended for posting to CARB website. For more information on ADA compliance for PDF documents go to the [Adobe Acrobat Creating and Verifying PDF Accessibility webpage](https://helpx.adobe.com/acrobat/using/create-verify-pdf-accessibility.html) (<https://helpx.adobe.com/acrobat/using/create-verify-pdf-accessibility.html>)



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