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*via* electronic transmission

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Subject: Comments on the Public Webinar for Proposed Amendments to the Consumer Products Regulations (July 28, 2020)

Dear Mr. Ramalingam, Mr. Calavita and Mr. Berghouse,

The Household & Commercial Products Association (HCPA) appreciates the opportunity to participate as an active stakeholder in the California Air Resources Board (CARB) Regulatory Strategies Work Group and the Regulatory Definitions Work Group, to discuss proposed amendments to the Consumer Products Regulations. This document includes HCPA member companies' initial comments on the final draft proposed amendments that were presented and discussed during the public workshop webinar conducted on July 28, 2020.

A. Manual Aerosol Air Freshener Product Category

As an initial matter, the newly created "Manual Aerosol Air Freshener" product category combines the currently regulated "Single Phase Aerosol" and "Double Phase Aerosol" Air Freshener product categories. Thus, HCPA member companies are confronted with a significant challenge in reformulating products that meet the currently applicable 30% VOC limit (Single Phase) and the 20% VOC limit (Double Phase) to comply with CARB's proposed 10% VOC limit for "Manual Aerosol Air Freshener" products by 2023.

CARB has proposed a second substantial reduction in the VOC content to a 5% VOC limit in 2027 (with the current 2% fragrance exemption). If, as currently proposed, the 2% fragrance exemption is eliminated in 2031, manufacturers would be forced to reformulate their products a third time to comply with the 5% VOC without a fragrance exemption. This will require both manufacturers and fragrance houses to once again expend a significant amount of time, effort and money to reevaluate product formulations.

Therefore, to limit the required number of reformulations, HCPA member companies could support the 5% VOC limit by 2031 (as opposed to the proposed 2027 effective date) with a 0.5% fragrance exemption continuing after 2031.

**B. Aerosol Crawling Bug Insecticide**

1. HCPA Members Support the Draft Proposal to Create a New Product Category for Bed Bug Insecticide.

HCPA member companies support CARB's proposal to create a new product category for bed bug insecticide retaining the current crawling bug insecticide 15% VOC limit for the aerosol form and a 20% VOC limit for all other forms. The U.S. Environmental Protection Agency (EPA) identifies bed bugs as "pests of significant public health importance."<sup>1</sup> This proposal will ensure that manufacturers can meet the EPA efficacy testing requirements needed to produce effective products to control bed bugs.

2. HCPA Members Could Support an 8% VOC limit for the Aerosol Crawling Bug Insecticide Product Category.

HCPA member companies continue to have serious concerns that aerosol crawling bug insecticides that kill or control other pests of significant public health importance such as cockroaches, mites, spiders and scorpions cannot be reformulated to comply with the proposed 6% VOC limit and meet EPA's current efficacy testing requirements.

The efficacy of aerosol crawling bug insecticide products is critically important since the bugs that are included in this category carry infectious diseases. Therefore, HCPA respectfully requests that CARB adopt an 8% VOC limit for the aerosol crawling bug insecticide product category effective January 1, 2030, with a 0.25% fragrance exemption in 2031 and continuing thereafter.

**C. HCPA Cannot Support the Draft Proposal to Sunset the Current Fragrance Exemption.**

The final draft proposal to sunset the 2% fragrance exemption by 2031 will impact almost every product category included in Article 2 of the Consumer Products Regulations and represents a *de facto* reduction of the VOC limits for thousands of consumer products.

Since the VOC limits are so strict and technology-forcing, many manufacturers currently formulate their products to be at – or just below – the applicable regulatory limit. If adopted, this provision will require manufacturers to expend extensive amounts of labor and capital resources to review compliant product formulations to ensure that these products will continue to meet

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<sup>1</sup> U.S. EPA Pesticide Registration (PR Notice) Notice 2002-1. Section 28(d) of the Federal Insecticide Fungicide and Rodenticide Act [7 U.S.C. § 136w-3(d)], requires EPA, in coordination with the U.S. Department of Health and Human Services and the U.S. Department of Agriculture to identify pests of significant public health importance and, in coordination with the Public Health Service, to develop and implement programs to improve and facilitate the safe and necessary use of chemical, biological and other methods to combat and control such pests of public health importance. See <https://www.epa.gov/sites/production/files/2014-04/documents/pr2002-1.pdf> and <https://www.epa.gov/insect-repellents/list-pests-significant-public-health-importance>

applicable VOC limits without the currently allowable fragrance exemption. In many cases, manufacturers will likely be required to completely reformulate a large number of products.

Product manufacturers only use the necessary amount of fragrance ingredients required to cover the malodor of base active ingredients, to encourage proper consumer use and to differentiate their brands and products. CARB's own data provides irrefutable evidence that product manufacturers do not over-use the current exemption that allows them to add a *de minimis* level of fragrance to products.<sup>2</sup>

The option to just simply eliminate the use of fragrance is not commercially viable. Marketing analysis establishes the fact that consumers generally make purchasing decisions based on the efficacy of a product and its unique scent. Fragrance-free products represent a very small percentage of consumer purchases.

Manufacturers frequently produce a product that has a single base formulation but is manufactured with different fragrances to meet customer preferences. The fragrance ingredients that create these various scents have different levels of LVP-VOC and VOC content. Under the current exemption, as long as the fragrance level is equal to or less than 2% by weight, the product manufacturer does not have to factor the fragrance into determining VOC compliance. Currently, manufacturers typically do not need to speciate the fragrance ingredients since the fragrance houses communicate that the supplied fragrance complies with the requirements of the exemption. However, if the fragrance exemption is eliminated, product manufacturers will require detailed information about the LVP-VOC and VOC content for each of the different fragrance compounds when formulating a product to determine whether each individually scented variant of that product complies with the applicable VOC limit. Moreover, manufacturers may be forced to reformulate products using a particular fragrance when there is a change to one of the many ingredients in that fragrance due to disruptions in supply chains or when essential raw materials suddenly become unavailable.

In addition to imposing substantial and costly burdens on product manufacturers and fragrance houses, the draft proposal to sunset the current fragrance exemption will not "simplify"<sup>3</sup> CARB's compliance determinations. Currently, CARB can buy and test a single variant of a product to determine compliance. However, if the VOC content of fragrance is required to be included in determining compliance, the Enforcement Division would have to purchase each differently-scented variant of a particular product because the VOC level of each fragrance may be different since one fragrance may pass and the next fail. And, the CARB Monitoring and Laboratory Division (MLD) would be required to include the speciation of fragrance ingredients contained in each differently-scented product as part of its determination of the total volatile material contained in that product. Moreover, it is not clear whether the MLD can detect and accurately measure the concentrations of fragrance components due to the large number and complexity of

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<sup>2</sup> As explained in the CARB Staff's Technical Support Document for the Phase 1 Rulemaking for Consumer Products (August 1990), "This exemption was established to allow manufacturers a *de minimus* [sic] level of these substances in various products such that the products may be marketed in an appealing manner to consumers." See <https://ww3.arb.ca.gov/consprod/regact/ph1cptsd.pdf> at pp. 6-7

<sup>3</sup> [CARB public webinar](#) (July 9, 2020) at Slide # 6.

fragrance ingredients that may be included in single fragrance compound. For example, a fragrance compound that has a level of 0.25% by weight in a particular product may contain 50 or more different fragrance ingredients. If CARB cannot speciate each fragrance ingredient, determine if they are VOCs or LVP-VOCs and subtract all LVP-VOCs from the total VOC content of the product, CARB will be unable to accurately determine whether a product complies with the applicable VOC limit.

Many products are formulated at – or just below – the applicable regulatory limit. Without the current fragrance exemption, unless MLD can accurately determine the VOC contribution of the fragrance, there will likely be more cases in which the MLD may make an initial determination that the total volatile material in many products exceed the applicable VOC limit. Thus, the Enforcement Division will issue an increased number of notices of violation (NOVs). And to the extent that product manufacturers are able to document compliance, the Enforcement Division will have expended a significant amount of time and effort in issuing NOVs that ultimately prove not to be actionable.

Therefore, HCPA members cannot support the draft proposal to sunset of the current fragrance exemption because it will impose an unduly significant amount of time and cost burdens on product manufacturers, fragrance houses and CARB staff while achieving only minimal additional VOC reductions.<sup>4</sup>

1. If the 2% Fragrance Exemption Is Eliminated in 2031, CARB Needs to Provide Some Level of Fragrance Exemption for Specific Product Categories to Address Technical Feasibility Challenges.

As an initial matter, a fragrance exemption for the Manual Aerosol Air Freshener and the Aerosol Crawling Bug Insecticide product categories needs to be determined in conjunction with the final decision on the VOC limit for these two product categories. Please refer to Paragraphs A and B of these comments.

CARB's current VOC limits are so strict and technology-forcing that manufacturers are required to formulate products at – or just below – the applicable regulatory limit. Therefore, HCPA member companies have identified specific product categories in which the elimination of the fragrance exemption will pose significant technical feasibility challenges.

The following table does not present a complete list of products and is not intended to replace any individual HCPA member company's discussions with CARB staff for the need of some level of fragrance exemption and/or technical challenges in other product categories.

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<sup>4</sup> Based on CARB's current calculations, sunsetting the current fragrance exemption will achieve 0.28 tons/day of additional VOC reductions. [CARB public webinar](#) (July 28, 2020) at Slide # 8.

<b>Product Category</b>	<b>Amount of Fragrance Exemption Needed</b>	<b>Reasons</b>
Bathroom and Tile Cleaner (Aerosol)	0.1%	Allowable percentage of VOCs are used for propellant; fragrance is needed to mask the amine odor of functional ingredients
Carpet / Upholstery Cleaner (Aerosol)	0.25%	Allowable percentage of VOCs are used for propellant; need fragrance to mask odor of functional ingredients
Disinfectant (Aerosol)	0.5%	Allowable percentage of VOCs used for alcohol and propellant; use the exemption to add fragrance for masking the odor of alcohol. EPA registrations list specific fragrances; levels set by primary registrant that may/may not market the product. Without a fragrance exemption, companies may be required to re-test and revise their EPA Confidential Statement of formula for their product(s).
Fabric Refresher (Aerosol)	0.25%	Allowable percentage of VOCs are used for propellant; need fragrance to achieve sensory perception to indicate proper use of the product
Fabric Refresher (Non-Aerosol)	0.1%	Allowable percentage of VOCs used primarily for ethanol, which is critical for rapid drying essential for product performance; need fragrance to achieve sensory perception to indicate proper use of the product
Furniture Maintenance Products (Aerosol)	0.25%	Allowable percentage of VOCs are used for solvents and propellant; need fragrance to mask odor of functional ingredients & to achieve sensory perception to indicate proper use of the product
Furniture Maintenance Products (Non-Aerosol)	0.25%	Allowable percentage of VOCs are solvents; need fragrance to mask the odor of functional ingredients & to achieve sensory perception to indicate proper use of the product
General Purpose Cleaner (Aerosol)	0.25%	Allowable percentage of VOCs used for propellant and solvent; need fragrance to provide scent to mask odor & indicate proper use of product
General Purpose Degreaser (Aerosol)	0.25%	Allowable percentage of VOCs used for propellant and solvent; need fragrance to provide scent to mask odor & indicate proper use of product

Product Category	Amount of Fragrance Exemption Needed	Reasons
Heavy-Duty Hand Cleaner or Soap (Non-Aerosol)	0.5%	Allowable percentage of VOCs used for solvent; products need aggressive fragrance profile to mask the odor of soils that they are removing
Metal Polish or Cleanser (Aerosol)	0.25%	Allowable amount of VOCs used for solvents and propellant; need fragrance to mask odor of functional ingredients & to indicate proper use of product
Metal Polish or Cleanser (Non-Aerosol)	0.25%	Allowable percentage of VOCs used for solvent; need fragrance to mask odor of functional ingredients & to indicate proper use of product
Sanitizer (Aerosol)	0.25%	Allowable amount of VOCs used for alcohol & propellant; use the exemption to add fragrance for masking the odor of alcohol
Toilet/Urinal Care Product (Non-Aerosol)	0.25%	Allowed amount of VOCs are used for functional performance; fragrance exemption is currently being used in products produced after 2015

HCPA requests that CARB provide the above-referenced level of fragrance exemption for each of these product categories beginning on January 1, 2031 and continuing thereafter.

2. HCPA Member Companies Can Support the Proposed 0.25% fragrance exemption for the Non-aerosol General Purpose Cleaner and General Purpose Degreaser Product Categories.

HCPA member companies can support CARB’s proposal to provide a 0.25% fragrance exemption (inclusive of monoterpenes) in 2031 and continuing thereafter. This limited exemption will provide product manufacturers with needed flexibility to use a small amount of fragrance in the Non-aerosol General Purpose Cleaner and General Purpose Degreaser product categories.

As currently drafted, CARB also proposes to allow 0.25% of monoterpenes in the Non-aerosol General Purpose Cleaner and General Purpose Degreaser product categories as part of 2% fragrance exemption beginning in 2023. HCPA respectfully requests that this provision take effect immediately upon publication of the final rule. This will ensure that the clear intent of the regulatory action will be implemented by the CARB Enforcement Division during the time period between the date the final rule is published and the January 1, 2023 effective date of the regulation.

HCPA also requests that upon publication of the final rule, CARB withdraw the guidance document titled, “Guidance Pertaining to the Two Percent Fragrance Exemption and Limonene”<sup>5</sup> since the issues addressed in this document will be incorporated in the regulation.

D. HCPA Cannot Support the Draft Proposal to Review “Web-based Claims” because It Is Vague and Overbroad.

HCPA member companies have serious concerns that the scope of the final draft proposed regulation is more extensive than necessary to achieve CARB’s goal of ensuring that product claims on a manufacturer’s website are consistent with the claims on the physical product label.

1. CARB Needs to Make Significant Revisions to the Proposed Definitions for the Terms “Label” and “Labeled.”

HCPA urges CARB make the following revisions to the definition of the term “label” and “labeled” to remedy the vague and overly broad language of the draft proposal.

Section. 94508 Definitions.

(77) “Label” means any written, printed, or graphic matter affixed to, applied to, attached to, blown into, formed into, molded into, embossed on, referenced on, appearing upon, or accompanying ~~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.

To ensure consistency with current text of the regulation, HCPA recommends adding the word “into” after the word “formed.”

CARB should delete the words “or connected with” since the use of this overly broad phrase could likely fail the intermediate level of scrutiny test of a government agency’s action to restrict commercial speech must not be “more extensive than is necessary” to advance the governmental interest.<sup>6</sup>

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<sup>5</sup> The guidance document is posted on the CARB website at:  
[https://www.arb.ca.gov/consprod/regact/prog\\_guide/program\\_guidance.htm](https://www.arb.ca.gov/consprod/regact/prog_guide/program_guidance.htm)

<sup>6</sup> In *National Association of Wheat Growers, et al. V. Becerra*, No. 2:17-cv2401 WBS EFB (E.D. Cal., June 22, 2020), the court explained, “Under *Central Hudson*, the government may restrict commercial speech ‘that is neither misleading nor connected to unlawful activity, as long as the governmental interest in regulating the speech is substantial.’ *Am. Beverage Ass’n. v. City & Cty. of San Francisco*, 916 F.3d 749, 755 (9th Cir. 2019) (quoting *Central Hudson*, 447 U.S. at 564). Under this intermediate level of scrutiny, the law at issue ‘must ‘directly advance the governmental interest asserted’ and must not be ‘more extensive than is necessary to serve that interest.’ *Id.* (quoting *Central Hudson*, 447 U.S. at 566).”

Section. 94508 Definitions.

- (78) “Labeled” means the “label” ~~all labels and other written, printed, video, or graphic, or other material:~~
- 1) that accompanies or is referenced by or on the product, including ~~but not limited to~~ any reference ~~whatsoever~~ to a website controlled directly by the product manufacturer, and
  - 2) that is part of ~~or connected with~~ the product’s marketing of a product for sale, supply or offer for sale in the state of California, and is controlled directly by the product manufacturer.

CARB should add the word “label,” which is defined in Section 94508(a) and delete the rest the wording because it is redundant, unnecessary and confusing.

CARB should strike the phrases “but not limited to” and “whatsoever” since these phrases are overly-broad and would likely fail the intermediate scrutiny test for limiting commercial speech.

The text of the regulation should reflect CARB’s oft-stated intention to review product claims on manufacturers’ websites by adding the phrase “controlled directly by the product manufacturer” after the word “website.”

CARB should delete the phrase “or connected with” since it is overly broad and could expand the scope of CARB’s review to almost any marketing claims, including claims and advertising statements made by third-party merchants (which CARB staff have stated are outside the scope of the agency’s proposed label claim review).

CARB should delete the word “product’s,” which is an imprecise possessive tense of the noun “product” and replace it with the words “of a product.”

CARB should ensure that the scope of review is consistent with the Section 94507 (*i.e.*, the Applicability Section) by adding the words “for sale, supply or offer for sale in the state of California.”

Finally, CARB should clarify its stated intention that the scope of label claim review would not include third-party websites and customer product reviews by ensuring that the new regulatory provision applies to marketing claims that are controlled by the manufacturer by adding the words “directly” and “product.”

2. CARB Needs to Make Significant Revisions to the Proposed New Sections of the Most Restrictive Limit Provision.

CARB needs to make the following revisions to the proposed new Section 94512(a)(3) of the Most Restrictive Limit provision to ensure that the exercise of CARB’s authority will be consistent with the clearly defined applicability requirements set forth in Section 94507.



94512. Administrative Requirements.

(a) Most Restrictive Limit.

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- (3) Where a manufacturer's claims regarding a consumer product manufactured on or after January 1, 2025 for sale, supply or offer for sale in the State of California differ materially ~~across different materials, such as~~ between the product label and the website controlled directly by the product manufacturer, the product shall fall into the product category as defined in Section 94508(a) with the ~~most stringent~~ lowest limit ~~for the claims made in any of the materials~~ as specified in Section 94509(a).

CARB should add the word "consumer" to modify "product" to be consistent with the term used in Section 94512(a)(1) of the Most Restrictive Limit Provision.

Product manufacturers need a reasonable amount of time to put into place procedures to ensure that product claims on their websites are consistent with claims on the physical product label of products that are sold, supplied or offered for sale in California. During its previous rulemakings, CARB has consistently provided a reasonable amount of time to comply with new enforcement provisions. Therefore, CARB should add the phrase "manufactured on or after January 1, 2025."

Product manufacturers have a legitimate right to exercise their First Amendment rights in using the Internet to market their products. By its very nature, the Internet is used throughout the United States. Thus, to avoid impermissible restrictions on protected speech and to ensure that the application of this new subsection of the Most Restrictive Limit provision is consistent with the requirements of Section 94507, CARB should add the phrase "for sale, supply or offer for sale in the State of California."

CARB should modify the word "differ" to clarify that the Most Restrictive Limit would apply in a situation where there is "material" difference between product claims appearing on a product label and product claims on the website controlled by a product manufacturer. The term "material" is a word that is used in many different legal contexts. As it pertains to the Consumer Products Regulations, it would be interpreted to mean something that would affect a person's decision-making to buy a product that is sold, supplied or offered for sale in the State of California. Therefore, CARB should add the word "materially" to modify "differ."

The phrase "across different materials, such as" is overly broad and should be deleted.

CARB should modify the term "label" by adding the word "product."

CARB should clarify their stated intention that the Most Restrictive Limit provision would not apply to statements appearing on third-party websites and customer reviews by adding the words "controlled directly by the product manufacturer."

The new provision should clearly state that it applies only to product categories that are defined in the regulation by adding the words “as defined in Section 94508(a).”

CARB should delete the phrase “most stringent” and replace it with the word “lowest,” since this word is consistent with the word “lower” that is used in the current text of Section 94512(a)(1). It is critically important that the most powerful enforcement provision in CARB’s Consumer Products Regulations use internally consistent language.

CARB should delete the overly-broad phrase “for the claims made in any of the materials.”

Finally, CARB should ensure that the new provision clearly refers to the VOC limits set forth in the Table of Standards by adding “as specified in Section 94509(a).” While one could argue that this is inferred, a well-written regulation should leave no room for any potential ambiguity.

HCPA respectfully requests that CARB make the following revisions to the proposed new Section 94512(a)(4) of the Most Restrictive Limit provision:

94512. Administrative Requirements.

(a) Most Restrictive Limit.

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(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~~ lower VOC limit.

The phrase “or other information” is overly-broad and should be deleted. HCPA believes that this type of overly-broad statement would likely be deemed to exceed the intermediate level of scrutiny test of a government agency’s action to limit commercial speech.

CARB should add the word “product” to modify the term “label” to ensure consistency with the definitions of “label” and “labeled.”

Finally, for reasons stated above, CARB should delete the phrase “more stringent” and replace it with the word “lower,” since this is the word that is used in the current text of Section 94512(a)(1).

E. CARB Should Revise the Definition for the “Institutional Product” or “Industrial and Institutional (I&I) Product” Category to More Clearly Define Which Products Are Subject to the Consumer Products Regulation.

HCPA member companies support CARB’s authority to regulate consumer and commercial products at the statewide level. While it is abundantly clear that CARB’s complex Consumer Products Regulation applies to “household products,” there is some potential ambiguity as to whether products sold to industrial facilities are subject to statewide VOC limits. Therefore, HCPA believes that CARB should revise the current definition for the “Industrial and Institutional (I&I) Product” Category to provide a clear “bright line” regulatory delineation between:  
(1) consumer and commercial product categories that are subject to these statewide VOC limits;

and (2) industrial products that are used only in the manufacturing process, which are outside of the scope of CARB's comprehensive statewide regulation.

CARB Advisory Number 307 provides much needed clarity in determining whether "industrial" products are regulated by the stringent statewide VOC limits. In pertinent part, the Advisory states that the current regulatory definition for the term "Institutional Product" or "Industrial and Institutional (I&I) Product" excludes "... products that are incorporated into or used exclusively in the manufacture or construction of the goods or commodities at the site of the establishment ...".<sup>7</sup> However, as a practical matter, it is often difficult for both CARB and product manufacturers to determine whether products sold to industrial facilities throughout the state fit into this narrowly-drawn exclusion.

To remove potential ambiguity about the applicability of CARB's statewide VOC limits to products that are sold to industrial facilities, HCPA recommends that CARB consider the following revision to the current definition of "Institutional Products" or "Institutional and Industrial (I&I) Products,"

(77) "Institutional Product" or "Industrial and Institutional (I&I) Product" means a consumer product that is designed for use in the maintenance or operation of an establishment that: (A) manufactures, transports, or sells goods or commodities, or provides services for profit; or (B) is engaged in the nonprofit promotion of a particular public, educational, or charitable cause. "Establishments" include, but are not limited to, government agencies, factories, schools, hospitals, sanitariums, prisons, restaurants, hotels, stores, automobile service and parts centers, health clubs, theaters, or transportation companies. "Institutional Product" does not include household products and products that are: ~~incorporated into or used exclusively in the manufacture or construction of the goods or commodities at the site of the establishment~~ (A) exclusively sold directly or through distributors to establishments which manufacture or construct goods or commodities; and (B) labeled exclusively for "use in the manufacturing process only."

This recommended revision is identical to the narrowly-tailored exemption provision in the current definition for the General Purpose Degreaser, Lubricant and Single Purpose Degreaser product categories.<sup>8</sup>

HCPA believes that this revision will eliminate potential ambiguity as to the applicability of the CARB's statewide regulatory standards. Moreover, HCPA believes that this revision will promote efforts by the CARB Staff to restrict the sale of unregulated products to consumers.

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<sup>7</sup> 17 CCR § 94508 (a)(77).

<sup>8</sup> 17 CCR §§ 94508 (a)(59)(C); (a)(82)(B); and (a)(123).

## **Conclusion**

HCPA appreciates CARB Staff's consideration of issues addressed in these comments. HCPA and our member companies commit to continuing to work cooperatively with other stakeholders and CARB Staff to develop technologically and commercially feasible VOC limits for the products, the definitions and other provisions included in this rulemaking.

Please contact us if you have questions about issues addressed in these comments.

Respectfully,

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