



THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

August 27, 2020

Via electronic submittal: csmrprod@arb.ca.gov

CARB Regulatory Development Staff:

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

The Metropolitan Water District of Southern California (Metropolitan) appreciates the opportunity to comment on the California Air Resources Board's (ARB's) July 28, 2020, presentation for the *Proposed Consumer Products Regulation Amendments*.

Background

Metropolitan is a regional water wholesaler that delivers approximately two million acre-feet of water per year to 26 member public agencies, who in turn provide water to nearly 19 million people in Los Angeles, Orange, Riverside, San Bernardino, San Diego, and Ventura counties. As the largest distributor of treated drinking water in the United States, Metropolitan operates and maintains a wide range of facilities, which include the Colorado River Aqueduct and the 45 high-lift synchronous electric pumps used to lift the water a total of 1,617 feet over the Whipple and Eagle Mountains. Metropolitan also owns and maintains 16 hydroelectric plants, 450 miles of high-voltage power lines, nine reservoirs, 830 miles of large-scale pipelines, and five water treatment plants.

In order to provide continued, uninterrupted service to member agencies throughout our extensive service area, the ability to quickly and safely conduct maintenance of our electrical equipment is critical to Metropolitan's operations.

Comment

Metropolitan supports ARB's proposed action to amend the definition of "Multi-Purpose Solvent" to exclude denatured alcohol products used exclusively to maintain electrical equipment for public utilities (see the presentation excerpt below).



THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

CARB Regulatory Development Staff

Page 2

August 27, 2020

Section 94508(a)(88)(B): 'Multi-Purpose Solvent'

- ❖ Exclude denatured alcohol products used exclusively to maintain electrical equipment at public utilities
 - ❖ Discussions with utilities indicate that some equipment can only be cleaned with denatured alcohol
 - ❖ Critical public and safety and flammability issue
 - ❖ Anticipate negligible VOC increase

Metropolitan's operations align similarly with other public utilities in that denatured alcohol may be required to maintain critical electrical equipment. Manufacturers specifically recommend denatured alcohol for the maintenance of sensitive electrical equipment because it does not leave any material residue and evaporates quickly. This limited use, as stated in the ARB presentation, would result in a negligible increase in VOC emissions.

Conclusion

Thank you again for the opportunity to comment on the July 28, 2020, presentation that outlined proposed changes to the *Consumer Products Regulations*. Metropolitan looks forward to working with ARB on this issue and asks that ARB incorporate this beneficial definition into the final draft language for the regulation.

If you have questions or need additional information, please contact Carol Kaufman [cykaufman@mwdh2o.com, (213) 217-6207] or Kiersten Melville [kmelville@mwdh2o.com, (213) 217-7187].

Very truly yours,

Daniel J. Guillory

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