



WD-40 Company Technical Center

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Subject: Reactivity, a Science Based Approach

The WD-40 Company is a California based company that markets Consumer Products throughout the globe. Our company has worked extensively with CARB to improve the Air Quality of the State of California. CARB has been a leader in directing the Consumer Product Industry to innovate their products to reduce VOC emissions and, in turn, to reduce ground level ozone (GLO). WD-40 Company and CARB have a shared interest to help clean the air for California and the rest of the US.

For almost a decade WD-40 Company worked with CARB to develop an appropriate VOC regulation to reduce VOCs in Multi-Purpose Lubricants. The goal was always to obtain clean air while providing flexibility to marketers to develop commercially feasible products for the Consumer. Over the years our company has changed propellants, altered solvents, and reduced our VOCs from 67% to 25%. As reformulation has become more and more difficult, we have looked to the science behind measuring the true impact of products in the production of ground level ozone. That search led us to Reactivity. Reactivity is sound Science. It focuses on the whole formula and the formula's ability to react with atmospheric nitrogen material to produce GLO. The reduction of the Maximum Incremental Reactivity (MIR) of a product **always** leads to a reduction in ozone production. Mass based regulations do not always reduce ozone production for a product and don't consistently measure the impact of various product formulas on the production of GLO.

WD-40 Company now believes Reactivity and MIR limits are the best and most reliable, scientific way to regulate Consumer Products. Science should lead the way to a better environment and more impactful regulations. The more reactivity information industry has available the more equipped they will be to push this science forward. CARB is in possession of all the Reactivity data to regulate our products. This data should be more fully shared with Industry. If a Reactivity limit can be used to confirm an equivalent

VOC reduction and if it can continue to provide Industry with the flexibility to make great products, it is a win for the Agency, a win for the Industry, and most importantly, a win for the environment.

In closing WD-40 Company would urge CARB to continue the use of Reactivity and to allow other products to use this science-based approach to be measuring and reducing the production of GLO derived from consumer products.

Thank you for your time and consideration to this issue. I would be happy to discuss this further or you can contact our consultant Doug Raymond at 440-339-4539 or at djraymond@reg-resources.com.

Sincerely,

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