



P.O. Box 80607, San Diego, CA 92138-0607

December 14, 2020

Via Email

Mr. Joe Calavita
Manager, Consumer Products Implementation Division
California Air Resources Board
Sacramento, CA 95812-0806
jcalavit@arb.ca.gov

Subject: 11/10/2020 CARB Workshop

Dear Mr. Calavita,

WD-40 Company appreciates the opportunity to comment on the 11/10/2020 Workshop presented by webinar from CARB on Amendments to the Consumer VOC Regulation. The WD-40 Company is a California company that markets Consumer Products. WD-40 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. WD-40 Company and CARB have a shared interest to clean the air for California

General Comments

WD-40 Company has worked with the CARB staff on these amendments. WD-40 Company commends the staff for their availability to discuss these amendments with Industry and specifically with our company. The staff has spent significant time and resources on these amendments.

Web based claims

WD-40 Company supports the staff's position to delay the inclusion of web-based claims into the definition of label. WD-40 Company is an international company, and our website information is for global use. Modifying our website for compliance in one state will be difficult. WD-40 Company is willing to work with the staff to develop workable language that we can comply with.

Conclusion

WD-40 Company appreciates the opportunity to work with the CARB staff. We look forward to continuing working with CARB on further amendments to the Consumer Products VOC regulations.

Thank you for this opportunity to comment. If you have any questions or comments please do not hesitate to contact our VOC consultant, Doug Raymond at 440-339-4539 or at djraymond@me.com.

Sincerely,

Ernest Bernarducci

Ernest Bernarducci, PhD
Vice President, Global Research and Development
WD-40 Company Technical Center
20 Chapin Road
Unit 1013
Pine Brook, NJ 07058
Phone: 858-251-5753

9715 Businesspark Ave., San Diego, CA 92131
Tel 858/251.5600 Fax 619/275.5823