

Suggested Process for Consumer Products Manufacturers to
Request Refinement of CARB Adjusted 2001 VOC Emissions Determinations

Introduction

California Air Resources Board (CARB) staff has received numerous requests from consumer products stakeholders for a process for working with staff to refine Adjusted 2001 Emissions Determinations on a per-company basis. In response, CARB staff suggests that a consumer products manufacturer or company follow a two-step process described below to determine if a refinement should be pursued. CARB staff is not requiring that a company follow this process; staff is simply suggesting it as an efficient way to address issues that may arise. For questions on this suggested process, please contact Judy Yee, Manager, Implementation Section, Stationary Source Division, at (916) 322-9148 or by e-mail at jyee@arb.ca.gov.

Step One:

1. A company should review its 1997 survey submittals for accuracy. Upon request, the CARB staff will provide a copy of the survey forms that were submitted by the company.
2. If applicable, the company should notify CARB staff in writing of any identified errors in its 1997 survey submittal, along with proposed corrections. Depending on the nature of the errors, a company may need to provide a written responsible party certification and additional supporting documentation such as internal company sales summaries.
3. It is suggested that a company obtain a rough estimate of its 2001 VOC emissions by multiplying sales and VOC content of its major product lines sold in California in 2001 and aggregating the VOCs from these products. The company should decide if its VOC estimate is significantly different from the CARB Adjusted 2001 VOC Emissions Determination for the company.

Step Two:

1. If a company decides that its VOC estimate is significantly different from the CARB Adjusted 2001 VOC Emissions Determination, the company may contact CARB staff for an initial consultation teleconference or meeting to discuss the company's estimate.
2. A company should contact CARB staff as early as possible regarding any issues it may have with the CARB Adjusted 2001 VOC Emissions Determination. To enable CARB staff to fully evaluate the written and electronic documentation submitted by the company and provide sufficient time to recalculate final fees, it

is highly recommended that such documentation and a written responsible party certification be submitted to CARB staff no later than September 15, 2003.

3. CARB will consider making changes to company specific emissions for the purpose of determining fees where convincing documented evidence is submitted in writing or electronic format. Example scenarios and documentation needed is as follows:

Example Scenarios and Documentation Needed

Example 1:

Where Company A has determined that its actual sales of a product(s) and associated VOC emissions in 2001 are significantly less than assumed in the CARB Adjusted 2001 VOC Emissions Determination or where Company A has reformulated a product(s) well below a standard(s) that became effective between 1997-2001 (i.e., VOC content is lower than assumed by CARB), Company A should provide CARB staff with a written explanation and responsible party certification, the proposed changes in the associated VOC emissions, and appropriate documentation. In some cases, CARB staff may not need to request identification of all products sold by Company A in California in 2001 and, for each product, formulation data, VOC content and sales. Company A should provide product specific information in an electronic format to expedite processing. Please consult with CARB staff to determine compatible electronic formats. CARB staff can also make available an electronic form for submittal of product specific information. The form will not be as comprehensive as the forms requested to be completed for the 48 product categories subject to CARB's 2001 Consumer Products and Commercial Product Survey. If Company A has submitted a response to CARB's 2001 Consumer Products and Commercial Product Survey, the affected products should be merely identified as having been included in that survey. Company A may also, at its discretion, submit supporting published market trend information and company revenue or financial information.

Example 2:

Where Company A has sold an entire product line or brand to Company B in the 1997-2001 time period and did not acquire or introduce any new product(s) or brand(s) during that time period, Company A should provide CARB staff with a written statement and certification by the responsible party, documentation of the date of sale/transfer, sales of the affected product/brand in the last full calendar year of Company A ownership, product formulation data and VOC content, an estimate of the associated VOC emissions, and contact information for Company B. CARB staff will contact Company B to determine if the associated VOC emissions can be added to the CARB Adjusted 2001 VOC Emissions Determination for Company B.