



January 29, 2009

Via Electronic Mail

California Air Resources Board
1001 I Street
Sacramento, California 95814
Attn: Alexa Malik, Clerk of the Board
<http://www.arb.ca.gov/lispub/comm/bclist.php>

Re: 15-Day Notice of Public Availability of Modified Text for the Public Hearing to Consider Proposed Amendments to the California Consumer Products Regulation

Dear Honorable Board Members:

The Solvents Industry Group (“SIG”)¹ of the American Chemistry Council is pleased to submit the following comments on the California Air Resources Board’s (“CARB” or “Board”) proposed modified text for Consumer Products Regulation and Test Method 310. SIG member companies would be significantly affected by this regulation and thus have an interest in the rule’s development and implementation. The comments below relate only to the modified text in the 15-day notice.

After careful review of the modified text, the SIG cannot support the adoption of the proposed definition of aromatic compound. The proposed definition is inconsistent with the definition used in the Consumer Products Regulation to define what compounds are considered VOCs. As described, the proposed aromatic definition would incorrectly classify aromatic compounds. SIG urges CARB to revise the proposed aromatic definition to the following:

“Aromatic Compound” means a carbon containing volatile compound whose predominant components contain one or more benzene or equivalent heterocyclic ring(s) and has an initial boiling point less than or equal to 216 C. “Aromatic Compound” does not include compounds excluded from the definition of Volatile Organic Compound (VOC) in this Section 94508(a).

¹ SIG represents major U.S. manufacturers of hydrocarbon and oxygenated solvents and was formed to address health, safety, and environmental issues affecting both the producers and users of those materials. Members of SIG include: The Dow Chemical Company, ExxonMobil Chemical Corporation, Shell Chemical LP, and Eastman Chemical Company.



As always, SIG appreciates the opportunity to work with CARB on regulations that may impact the solvent industry. Thank you for considering these comments. If you have any questions, please contact me at (703) 741-5612 or Leslie_Berry@americanchemistry.com.

Sincerely,



Leslie Berry
Solvent Industry Group Panel Manager
Chemical Products and Technology Division