

[Fwd: Definition of Vinyl and Rubber Protectants]

Subject: [Fwd: Definition of Vinyl and Rubber Protectants]

From: David Mallory dmallory@arb.ca.gov

Date: Wed, 01 Nov 2006 11:04:20-0800

To: Janette Brooks jbrooks@arb.ca.gov, Evan Wong <ewwong@arb.ca.gov>, Trish Johnson <tjohnson@arb.ca.gov>, Clerk of the Board <cotb@arb.ca.gov>

----- Original Message -----

Subject: Definition of Vinyl and Rubber Protectants

Date: Wed, 01 Nov 2006 11:33:29 -0600

From: Jim Heidel <JHeidel@turtlewax.com>

To: dmallory@arb.ca.gov

CC: Michael Schultz <MSchultz@turtlewax.com>, Rich Kelly <RKelly@turtlewax.com>

Mr. David Mallory and the Clerk of the Board:

Per our phone conversation of October 26th, 2006, Turtle Wax, Inc. is happy to respond to your inquiry about our Tire Dressings.

Turtle Wax has always considered that the definition of the Vinyl and Rubber category included tire dressings (ie: both vinyl and rubber surfaces). See Sec. 94508(a)(123). Tires are made of rubber and rubber, after all, is mentioned in the category title. At the time that the definition was written, many products describe use on both vinyl and rubber, including tires.

It seems logical that products designed for use on either or both surfaces would be included in this category. For that reason, Turtle Wax Inc. designed and engineered products to be compliant with both of the regulations for aerosols (1/1/05) and non-aerosol (12/31/02) products. This included extensive research and re-formulation of several products (both aerosol and non-aerosol) for over a year leading up to the effective dates.

I hope that this answers your questions raised in your phone conversation of October 26th. As always, if I can be of further assistance, please feel free to call.

James P. Heidel - Technical Director, R & D
Turtle Wax, Inc.
625 Willowbrook Centre Parkway
Willowbrook, Il. 60527

[Fwd: Definition of Vinyl and Rubber Protectants]

Jim Heidel R&D
jheidel@turtlewax.com
1(630)455-3861

NOTICE: This e-mail message and any attachments transmitted with it are intended solely for the use of the addressee and may contain confidential information. If the reader of this message is not the intended recipient, or an employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any dissemination, distribution, copying, or other use of this message or its attachments is strictly prohibited. If you have received this message in error, please notify the sender immediately by replying to this message and please delete it from your computer.