

SUNNYSIDE CORPORATION

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November 9, 2006

Clerk of the Board
Air Resources Board
1001 I Street, 23rd Floor
Sacramento, California 95814

To whom it may concern:

I am attaching a copy of a letter that was sent to Janette Brooks on October 23, 2006. David Mallory of California Resources Board called me on November 3, 2006 in regard to this letter. I would like to request that this communication and attached letter be entered into the public record.

As explained to David Mallory, Sunnyside packages several organic solvents which are used for thinning, cleaning and other purposes. There are references to regulated uses, i.e. degreasing, spot removal, adhesive clean-up, on the back panel of several product labels. As referenced in the Air Resources Board's memo of September 19, 2006, "Currently, products which are multi-function are subject to the most restrictive VOC limit as it applies to representations manufacturers make on the principal display panel of the product. As of January 1, 2007, manufacturer representations made anywhere on the label, packaging, and all affixed labels or stickers will be used to determine the applicable VOC limit for that product."

This short notice does not allow adequate time for Sunnyside to make this label change. At least thirty lithographed labels require changes.

In a November 7th telephone conversation David Mallory stated that enforcement of the multi-function requirements would not occur for at least 10 months from the date of adoption by the Board. While this does not allow adequate time for us to deplete stocks of empty containers, we will nonetheless operate under the assumption that this statement is accurate.

Thank you for your consideration of our request, and we would appreciate a written reply to our concerns.

Very truly yours,
SUNNYSIDE CORPORATION

Henry E. Buchanan
Director of Technical Services
and Regulatory Affairs





October 23, 2006

Janette Brooks, Chief
Air Quality Measures Branch
Stationary Source Division
Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Dear Ms. Brooks:

I am writing on behalf of Sunnyside Corporation, a packager of paint related solvents. Specifically, my letter addresses the subject of multi-function products and the regulatory change which will be effective January 1, 2007. The change from use references on the principal display panel, to anywhere on the label, will affect many of our products.

Most of the affected products are packaged in lithographed containers, and it will take some time to work through inventories of empty containers and lithographed plate. We are asking for a more reasonable phase-in time period for this change to enable us to make required label changes to these products. A three year sell through period, and a more realistic notification period would be helpful. The cost for these label changes is considerable, and would be greatly increased if a large number of cans and plate is scrapped.

Thank you for your consideration of our request.

Very truly yours,
SUNNYSIDE CORPORATION

Henry E. Buchanan
Director of Technical Services
and Regulatory Affairs