



U.S. AUTOMOTIVE PARTS GROUP

WESTERN GROUP

7150 SOUTH FULTON STREET, #300

CENTENNIAL, COLORADO 80112

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Dan Askey
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November 9, 2006

David Mallory, P.E.
Manager, Measures Development Section, Stationary Source Division
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812
dmallory@arb.ca.gov

Dear Mr. Mallory,

NAPA Auto Parts and our over 400 independent NAPA Store Owners in California are very concerned about the VOC emission standards for four automotive maintenance product categories in the proposed CONS-2 regulation.

The proposed 10% VOC standard for Brake Cleaners, Carburetor or Fuel-Injection Air Intake Cleaners, Engine Degreasers and General Purpose Degreasers could harm the ability of automotive technicians to effectively clean and maintain vehicles. Proper vehicle system maintenance is essential to maintaining the proper wear of automotive parts like brakes, carburetors, engines and others. We are also concerned that the ARB has not considered the potential hazards that may be caused by residues on automotive brake parts or the safety benefits of effective brake maintenance, replacement and repair.

NAPA understands that the automotive product industry has already reduced emissions from these products and has offered to make additional reductions. Therefore, we are asking ARB to reconsider its 10% VOC standards and consider a compromise that will protect California's air quality without having a negative impact on our members' ability to provide quality vehicle maintenance.

Sincerely,

Dan Askey
Western Group Vice President
US Automotive Parts Group