



CHICAGO AEROSOL™

BRIDGEVIEW FACILITY

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September 24, 2013

Mary Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95912

via web portal - <http://www.arb.ca.gov/lispub/comm/bclist.php>

RE: Proposed Amendments to the Aerosol Coating Products and the
Consumer Products Regulations

Dear Chair Nichols:

Chicago Aerosol appreciates the opportunity to comment on the Proposed Amendments to the Aerosol Coating Products and the Consumer Products Regulations scheduled for consideration by the California Air Resources Board on September 26, 2013. We support the specific comments submitted by both the American Coatings Association and the Consumer Specialty Products Association on the Proposed Amendments.

The consumer products industry has been actively engaged with the California Air Resources Board since the promulgation of the Consumer Products Regulation in the late 1980s. Product formulators expend countless hours and considerable amount of research and development resources to reformulate products that meet consumers' needs and comply with the ARB's stringent regulatory standards. We have worked collectively to achieve the specific VOC limits by category to address air quality standards and have invested hundreds of millions of dollars in research and development to achieve these results.

Chicago Aerosol, as a member of the American Coatings Association Spray Paint Manufacturers Committee, was deeply involved in the process that has resulted in the Proposed Amendments to the Aerosol Coating Products Regulations. We also participated, as a member of the Consumer Specialty Products Association, in the workshops and other meetings that have resulted in the Proposed Amendments to the Consumer Products Regulations.

Chicago Aerosol appreciates the opportunity for stakeholder input as the proposed regulation was developed. The Planning and Technical Support Division staff conducted

several public workshops and considered the technical input of stakeholders in revising the proposed amendments to help ensure the final draft achieved the required emissions reductions and does not compromise the statutory requirements to ensure that proposals must be technically and commercially feasible and does not eliminate any product form.

While the proposed regulatory provisions are technically challenging for the industry to meet, we believe that the proposed amendments are a reasonable approach to meeting the required emissions reductions and we commit to expend the necessary time and effort to meet these new regulatory standards.

Sincerely,

A handwritten signature in black ink, appearing to read "Edward S. Piszynski", with a long horizontal flourish extending to the right.

Edward S. Piszynski
Vice President, Laboratory Services