



September 25, 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:

The Dow Chemical Company 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.

Dow supplies raw materials to the consumer products industry which 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.

Dow supports the specific comments submitted by the American Coatings Association and the Consumer Specialty Products Association on the Proposed Amendments.

Dow 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 that reads "Dru Toman".

Dru Toman  
Product Sustainability Leader  
Dow Consumer and Industrial Solutions  
The Dow Chemical Company  
datoman@dow.com

