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Director
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S. C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-2236

September 16, 2009

Clerk of the Board
Air Resources Board
1001 I Street
Sacramento CA 95814

To the Clerk of the Board:

Re: Proposed Amendments to the California Consumer Products Regulations

S. C. Johnson & Son, Inc. (SCJ) is submitting comments on proposed amendments to the Consumer Products Regulations to be considered at the Air Resources Board (ARB) hearing on September 24, 2009. Specifically, SCJ wishes to express its support for the proposed amendments affecting the Air Freshener category.

SCJ is a 120-year-old global manufacturer and marketer of household consumer products. Our products include Glade® air fresheners which are sold throughout California.

The ARB is considering changing the aerosol Air Freshener VOC limit to 20% effective December 31, 2012. In spite of the fact the ARB's industry data indicates virtually no products in the most recent survey meet this proposed VOC limit, SCJ supports the staff proposal. The new limit will present obvious reformulation challenges to SCJ and others in industry based on the survey data. But in response to industry concerns, the ARB staff modified its original proposed effective date and provided an additional year to December 31, 2012 for companies to research, develop, and implement reformulation options.

During the regulatory process, SC Johnson appreciated the willingness of ARB staff to review industry technical arguments regarding this category, and in a period of recession, to consider economic concerns as well in recommending extending the effective date to December 2012.

SC Johnson urges Board adoption of the staff recommendations for the Air Freshener category.

Sincerely,



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