

South Coast Air Quality Management District

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Barry Wallerstein
09-8-4

Naveen Berry

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September 22, 2009

James Goldstene
Executive Director
California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

Reference: 09-8-4: Public Hearing to Consider Adoption of Proposed
Amendments to the California Consumer Products Regulations

Dear Mr. Goldstene:

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the Proposed Amendments to the Regulation for Reducing Emissions from Consumer Products to be considered at your September Board Meeting.

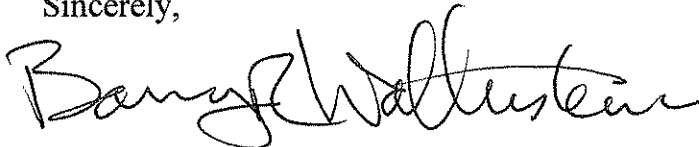
In general, SCAQMD staff supports the proposed amendments and believes that, upon full implementation, the regulation will significantly reduce emissions from consumer products statewide. However, we need to express a concern that the proposed implementation schedule is too lengthy for Southern California health needs and that some of the small container exemptions could potentially create unintended loopholes. As you know, the SCAQMD has already adopted a similar regulation, Rule 1143, with tighter implementation dates for the interim and final limits of January 2010 and January 2011, respectively.

SCAQMD intends to fully implement Rule 1143, but is currently defending the rule in CEQA litigation. In the event that SCAQMD does not prevail in the litigation (which we do NOT anticipate), SCAQMD would petition CARB to implement the proposed VOC limits on a tighter schedule.

We look forward to working closely with CARB towards attaining our mutual goals of reaching attainment of State and Federal air quality standards and further protecting the health of all Californians.

Thank you for the opportunity to comment on this very important rulemaking.

Sincerely,

A handwritten signature in black ink, appearing to read "Barry R. Wallerstein". The signature is fluid and cursive, with the first name "Barry" and last name "Wallerstein" clearly distinguishable.

Barry R. Wallerstein, D.Env.
Executive Officer

cc: Mary Nichols, Chair, CARB
CARB Board
Bob Fletcher, Division Chief
Elaine Chang, DrPH
Laki Tisopulos, Ph.D., P.E