

Subject: [Fwd: Auto VOC standards Unreasonable]
From: David Mallory <dmallory@arb.ca.gov>
Date: Wed, 04 Oct 2006 13:47:43 -0700
To: Clerk of the Board <cotb@arb.ca.gov>, Trish Johnson <tjohnson@arb.ca.gov>

Consumer Products comment

----- Original Message -----

Subject:Auto VOC standards Unreasonable
Date:Wed, 04 Oct 2006 13:35:14 -0700
From:Neal Jennings <neal@jbdewar.com>
To:dmallory@arb.ca.gov

Effective automotive maintenance provides very significant benefits to consumers through improved automotive safety, extending vehicle and part life spans, minimizing automotive air emissions, and lowering energy use.

We are concerned that the ARB's proposed 10% VOC standards for Brake Cleaners, Carburetor or Fuel-Injection Air Intake Cleaners, Engine Degreasers, and General Purpose Degreasers could **damage our ability to effectively clean and maintain vehicles**

We are also concerned that the ARB has not considered the potential hazards that may be caused by residues on brake parts automotive, or the **safety benefits of effective brake maintenance and repair.**

We also believe that these new standards could have **negative cost impacts to the automotive service industry and consumers** due to the additional time required for brake jobs and other maintenance caused by using slower-drying and less effective brake cleaners and other automotive maintenance products. Time is extremely valuable in this profession; and lost time has serious negative impacts on our businesses.

Therefore, we are asking the ARB to reconsider its 10% VOC standards, and finally consider a compromise, so that we are not endangered in our ability to provide cost-effective maintenance to automotive consumer in California.

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