



October 23, 2006

Clerk of the Board
Air Resources Board
1001 I Street
P.O. Box 2815
Sacramento, California 95812

Subject: Rubber & Vinyl Protectant Definition

Dear Clerk of the Board,

Shield Packaging is aerosol filler with locations in Massachusetts and in California. Shield Packaging produces Consumer Products in many of the categories (Hair Care Products, Automotive Products, Lubricants, Cleaners and Degreasers) that are currently regulated as well as some aerosol coatings regulated under the aerosol coating regulation.

Shield Packaging appreciates the opportunity to comment on this proposal regulations. In particular we are concerned with the proposed changes to the Rubber and Vinyl Protectants definition. The definition appears to encompass additional products that are now considered aerosol coatings. The proposed definition does not clarify the issue; on the contrary the proposed definition further complicates the issue. Also, the Technical Support Document describing Rubber and Vinyl Protectants infers that "plastics" are covered under Rubber and Vinyl Protectants. Plastics should not be included in the Rubber and Vinyl Protectants.


In the Technical Support Document, it states ARB staff requested an early submittal of the 2005 survey data from marketers. We were unaware of this request and are concerned that some of our customers were not properly notified and failed to submit data.

Shield Packaging is concerned that this change will adversely affect our customers' products without their knowledge. It was our understanding that Rubber and Vinyl Protectants would be included in the next survey. We believe that when the formal survey is done then that would be the best time for a definition change.

Shield Packaging requests that this issue be deferred until the next survey is performed. At that time all companies that will have products affected will be afforded the opportunity to provide input into this process.

Thank you in advance for your time and consideration of this issue.

Sincerely,



Roger R. Vanderlaan
General Manager

cc: Robert D. Fletcher, P.E., Division Chief, Stationary Source Division
Robert D. Barham, Ph.D., Assistant Division Chief, Stationary Source Division
Janette M. Brooks, Chief, Air Quality Measures Branch, Stationary Source Division
David Mallory, Manager, Measures Development, Stationary Source Division