



October 31, 2006

David Mallory, P.E.
Manager, Measures Development Section
Stationary Source Division
California Air Resources Board
1001 I Street, 6th Floor
P.O. Box 2815
Sacramento, CA 95812

Re: Consumer Products Rule: Rubber/Vinyl Protectant Category

Dear Mr. Mallory:

The purpose of this letter is to provide The Clorox Company's interpretation of the current Rubber/Vinyl Protectants category included in the Consumer Products rule.

Clorox, with world headquarters in Oakland, is a manufacturer and marketer of many well-known consumer products, including *Clorox* bleach, *Formula 409* and *Pine-Sol* home cleaning products, *Fresh Step* cat litter, *Kingsford* barbecue products, *Hidden Valley Ranch* salad dressing, *Brita* water filtration systems, *STP* and *Armor All* auto care products, and *Glad* plastic bags, wraps and containers.

The Clorox Company manufactures and sells into California a number of products whose intended use is to clean, shine and protect tires. These products leave behind an appearance enhancing protective substance. These products clearly fall under the regulated product category, "Rubber and Vinyl Protectant".

Please do not hesitate to contact me at 925-425-6674 if we can provide further information. We look forward to working with you.

Sincerely,

A handwritten signature in cursive script that reads "Jim McCabe".

Jim McCabe
Senior Scientist

Cc: Robin Gentz

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