

SUNNYSIDE CORPORATION

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October 23, 2006

Janette Brooks, Chief
Air Quality Measures Branch
Stationary Source Division
Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Dear Ms. Brooks:

I am writing on behalf of Sunnyside Corporation, a packager of paint related solvents. Specifically, my letter addresses the subject of multi-function products and the regulatory change which will be effective January 1, 2007. The change from use references on the principal display panel, to anywhere on the label, will affect many of our products.

Most of the affected products are packaged in lithographed containers, and it will take some time to work through inventories of empty containers and lithographed plate. We are asking for a more reasonable phase-in time period for this change to enable us to make required label changes to these products. A three year sell through period, and a more realistic notification period would be helpful. The cost for these label changes is considerable, and would be greatly increased if a large number of cans and plate is scrapped.

Thank you for your consideration of our request.

Very truly yours,
SUNNYSIDE CORPORATION

Henry E. Buchanan
Director of Technical Services
and Regulatory Affairs