



November 10, 2006

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

Subject: Electronic Cleaner Definition

Dear Clerk of the Board,

ITW Chemtronics manufactures chemical cleaning products that are used in manufacturing or rework and repair of electronics. Many of our products in the electronics cleaner category are formulated to be nonflammable, plastics compatible, efficient cleaners with relatively fast evaporation rates. Since the mid 1990s, many of our electronics cleaners were based on HCFC-141b. As you know, HCFC-141b has been phased out due to its ozone depletion potential. Our reformulated product line is based on nonflammable chemicals that exhibit similar characteristics to HCFC-141b, such as HCFC-225ca/cb, HFC-43-10mee and HFC-365mfc. These replacement chemicals are exempt under the Federal VOC rule; however, they are not considered exempt under the CARB VOC definition. As a result, many of our reformulated products will not be available to our industrial customers in California next year.

We wish to comment on the proposed changes to the Electronic Cleaner category in the Technical Support Document dated September 29, 2006. Our comments are limited to the Electronic Cleaner category proposed definition change. ITW Chemtronics requests an exclusion of electronic cleaning products under this category when these products are sold to establishments that manufacture, install or repair goods or commodities (and are labeled "not for retail sale"). This is an expansion of the current wording to include rework and repair products that are sold to professionals involved in installation and

repair services. We believe this is a reasonable request based on the negative impact the Consumer Products rule would have on these businesses if this change is not approved. Without the appropriate cleaning products, the function and performance of electronics can be severely affected, ultimately resulting in failure and additional electronic waste. Thank you for your time and consideration on this issue. If you have any questions please feel free to contact me at 770-424-4888 x119.

Sincerely,

A handwritten signature in black ink that reads "Sue Max". The signature is fluid and cursive, with the first name "Sue" and last name "Max" clearly distinguishable.

Sue Max
Technology Manager
ITW Chemtronics

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