Winston H. Hickox
Agency Secretary

Air Resources Board

Alan C. Lloyd, Ph.D.
Chairman
2020 L Street • P.O. Box 2815 • Sacramento, California 95812 • www.arb.ca.gov

Gray Davis
Governor

March 27, 2000

Dear Sir or Madam:

On April 11, 2000, Air Resources Board (ARB) staff will be conducting a public workshop on a proposed reactivity regulation for aerosol coatings. This program was previously referred to as the proposed California Low Emissions and Reactivity (CLEAR) Regulation for Aerosol Coatings. The CLEAR Regulation was being designed as a voluntary, alternative way to meet the January 1, 2002, volatile organic compound (VOC) content limits in the current Aerosol Coatings Regulation. **ARB staff is no longer proposing an optional reactivity program.** Instead, at this public workshop, staff will be presenting a proposal for **mandatory reactivity limits** to replace the January 1, 2002, VOC content limits. Staff has discussed this approach with aerosol coatings manufacturers and initial comments have been favorable.

At the workshop we will also be presenting proposed amendments to ARB Method 310, "Determination of Volatile Organic Compounds in Consumer Products." These amendments are being proposed to specify that Method 310 can also be used with formulation data to verify and provide discrete results for individual ingredients in aerosol coatings. Currently, analysis of aerosol coatings by Method 310 gives a total VOC content.

Because the reactivity limits would become mandatory, we no longer are proposing a separate CLEAR Regulation. Instead, we will be presenting proposed amendments to the existing Aerosol Coatings Regulation, sections 94520-94528, Title 17, California Code of Regulations. A draft regulation with our proposal, as well as proposed amendments to Method 310, will be mailed under separate cover and placed on our website (http://www.arb.ca.gov/consprod/regact/aerocoat/aerocoat.htm).

The workshop will be held at the time and location shown below:

Date:	April 11, 2000
Time:	10:00 a.m.
Location:	California Air Resources Board 2020 L Street Fourth Floor Conference Room Sacramento, California

We welcome your continued participation in this effort. If you have any questions regarding the public workshop or the proposal, please contact Ms. Carla Takemoto, Manager, Technical Evaluation Section, at (916) 322-8283. This facility is accessible to persons with disabilities. If accommodation is needed, please contact Ms. Kathy Spring, at (916) 323-3485 by March 31, 2000. Persons with

hearing or speech impairments can contact us by using our Telephone Device for the Deaf (TDD) at (916) 324-9431, or (800) 700-8326 for TDD calls from outside the Sacramento area.

Sincerely,

Janette Brooks

Janette Brooks, Chief
Air Quality Measures Branch

cc: Ms. Carla Takemoto
Manager, Technical Evaluation Section
Stationary Source Division

Ms. Kathy Spring
Air Quality Measures Branch
Stationary Source Division