



August 5, 2011

To Whom It May Concern:

Lexel Clear is packaged in quantities less than 16 ounces, and is therefore covered by the Consumer Products regulations described below. The exemption for clear/paintable/water resistant caulking compound applies to this product, and we are not required to meet the § 94509. *Standards for Consumer Products* level of 1.5% VOC by weight (non-chemically curing) sealant and caulking compound regulation. The consumer products regulations in the Ozone Transport States, LADCO, and Canada have mirrored the California regulations (as written below) and also exempt Lexel Clear from the VOC regulations.

The California EPA Air Resources Board publication: REGULATION FOR REDUCING VOLATILE ORGANIC COMPOUND EMISSIONS FROM CONSUMER PRODUCTS, SUBCHAPTER 8.5 CONSUMER PRODUCTS, Article 2. Consumer Products § 94508. Definitions. (130) states that “Sealant and Caulking Compound” means any product with adhesive properties that is designed to fill, seal, waterproof, or weatherproof gaps or joints between two surfaces. “Sealant and Caulking Compound” does not include roof cements and roof sealants; insulating foams; removable caulking compounds; clear/paintable/water resistant caulking compounds... “clear/paintable/water resistant caulking compounds” means a compound which contains no appreciable level of opaque fillers or pigments; transmits most or all visible light through the caulk when cured; is paintable; and is immediately resistant to precipitation upon application. We know for a fact that this exemption applies to Lexel Clear, because we were at the original hearings and had them write this into the regulations for our product.

Please contact me if you require any further information. Thank you.

Sincerely,

Andy Spoelstra  
Chemist  
Sashco, Inc.