



CRC Industries, Inc.

AMERICAS GROUP

September 23, 2013

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95912
via web portal - <http://www.arb.ca.gov/lispub/comm/bclist.php>

RE: Proposed Amendments to the Consumer Products Regulations

Clerk of the Board:

CRC Industries, Inc. appreciates the opportunity to comment on the amendments to the Consumer Products regulation. These amendments are to be heard by the California Air Resources Board on September 26, 2013.

CRC Industries is a manufacturer and marketer of specialty chemicals for maintenance and repair professionals and do-it-yourselfers, serving the automotive, heavy trucking, marine, electrical, industrial, hardware and aviation markets.

CRC has the following comments on the amendments:

- CRC supports the definition changes to the Dry Lubricant, and Multi-purpose Lubricant. The Dry Lubricant change was needed to ensure that Dry Lubricants were not subject to other lubricant VOC limits. The Multi-purpose lubricant change was needed to clarify that products for use as a single use are not regulated by the Multi-purpose Lubricant limit. Both changes clarified the regulation.
- CRC supports the addition of the Single-Use Cleaner and Single-Use Degreaser definition. CRC produces products that are General Purpose and for Single Use. These definitions were needed to clarify the difference in these products.
- CRC supports the scientific pathway being taken by the staff in dealing with the Low Vapor Pressure (LVP) provision. LVP compounds are extremely important in CRC maintaining compliance with current and future VOC limits. The LVP provision is needed to provide technical feasibility to the current VOC limits.
- CRC has used the LVP provision as a way to meet the very difficult VOC levels. LVP's remain the way forward for compliance.

In conclusion CRC supports the Consumer Products amendments. We appreciate the staffs' willingness to meet and work with us on these important issues.

Thank you for your consideration to these comments. Any questions or comments feel free to contact our consultant Doug Raymond at 440-474-4999 or at djraymond@reg-resources.com.

Sincerely

A handwritten signature in blue ink, appearing to read "ASelisker".

Adam M. Selisker

c: Carla Takemoto, Air Resources Board
Doug Raymond, Raymond Regulatory Resources (3R), LLC