



CRC Industries, Inc.

AMERICAS GROUP

November 15, 2010

Air Resources Board
1001 I Street, 23rd Floor
Sacramento, California 95814

Attn: Ms. Lori Andreoni
Manager Board Administration and Regulations Coordination Unit
<http://www.arb.ca.gov/lispub/comm/bclist.php>

Subject: Comments on Proposed Amendments to the California Consumer Products Regulation;
Board Agenda Item #10-10-7

Dear Members of the Board,

CRC Industries, Inc. appreciates the opportunity to comment on the amendments to the Consumer Products Regulation. CRC produces a wide variety of consumer and industrial specialty chemical products.

CRC Industries has been working with the ARB staff to achieve emission reductions and preserve product functionality. We support the ARB staff recommendations with the proposed changes to the lubricant category. The lubricant categories need to remain separate and distinct entities. These products are developed for specific uses. ARB staff is justified in separating these categories and not keeping the one category of Special Purpose Lubricants. We will continue to work with ARB staff to ensure the lubricant categories are defined appropriately.

The limits being proposed are technology forcing and will be challenging to meet. We are prepared to work toward achieving these limits and providing effective products to our customers.

CRC appreciates the opportunity to work with ARB staff on this important issue. Any questions feel free to contact me at (215) 442-6223 or by e-mail at aselisker@crcindustries.com.

Sincerely,

CRC INDUSTRIES, INC.

A handwritten signature in black ink, appearing to read "Adam M. Selisker".

Adam M. Selisker
Vice President, Technology