March 22, 2021

Clerks’ Office

California Air Resources Board

1001 I Street

Sacramento, California 95814

https://www.arb.ca.gov/lispub/comm/bclist.php

Subject: **Comments on Proposed Amendments to the California Consumer Products Regulation;**

**Board Agenda Item # 21-2-1**

Dear Board Members:

CRC Industries appreciates the opportunity to comment on the amendments to the Consumer Products VOC Regulation. 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 is only commenting on the Energized Electrical Cleaner definition and Record Retention requirements 94512(f). CRC supports the new language for the Energized Electrical Cleaner definition. The new language aligns the VOC regulations with the Air Toxic rule. In addition, CRC does not oppose the record retention requirement at 94512(f) as long as our understanding that the wording “already routinely generated” implies that no new documents need to be created or stored by the retailer.

We would like to thank the staff for their work on this issue and the continued willingness to meet with us either in person or virtually throughout this process. Thank you in advance for your consideration to this issue. Any questions or comments feel free to contact our consultant Doug Raymond at 440-339-4539 or at [djraymond@me.com](mailto:djraymond@me.com)

Sincerely,

CRC Industries, Inc.



Michelle Rudnick

Directory of Regulatory Affairs

Cc: Ravi.Ramalingam@arb.ca.gov

joe.calavita@arb.ca.gov

josh.berghouse@arb.ca.gov

[david.edwards@arb.ca.gov](mailto:david.edwards@arb.ca.gov)

[jose.gomez@arb.ca.gov](mailto:jose.gomez@arb.ca.gov)