



## Radiator Specialty Company

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Air Resources Board  
1001 I Street, 23<sup>rd</sup> 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 Air Resources Board,

Radiator Specialty Company appreciates the opportunity to comment on the proposed amendments to the Consumer Products Regulation. Radiator Specialty produces specialty chemical products for both retail and commercial applications. Our product lines include the Gunk® cleaners and degreasers, the Liquid Wrench® lubricants, and the MotorMedic® line of engine and transmission treatments. We also manufacture a variety of specialty firearm lubricants and cleaners for retail sale as well as for military and law enforcement use.

Radiator Specialty Company has consistently worked with the ARB staff to achieve emission reductions and preserve product functionality. We support the ARB staff recommendations for the proposed changes to the lubricant category. The lubricant categories must remain separate and distinct entities. These products are developed for specific uses and require vastly different physical and chemical properties depending upon each end use. ARB staff is justified in separating these categories and not keeping the one "catch-all" category of "Special Purpose Lubricants". We will continue to work with ARB staff to ensure that lubricant categories are defined appropriately to reflect the needs and safety of all end users.

The limits being proposed are technology forcing and will be challenging to meet. That being said, we are prepared to work diligently toward achieving those limits while still providing safe and effective products to our customers in the retail, military, and law enforcement community.

Radiator Specialty appreciates the opportunity to work with the ARB staff on this important issue. If you have any questions, feel free to contact me directly at (704) 684-1802 or by e-mail at [Lbeaver@rscbrands.com](mailto:Lbeaver@rscbrands.com)

Sincerely,

Larry G. Beaver, Ph.D  
Vice President, Technology