

December 2, 2020

Via Email

Mr. Joe Calavita

Manager, Consumer Products Implementation Division

California Air Resources Board

Sacramento, CA 95812-0806

jcalavit@arb.ca.gov

Subject: 11/10/2020 CARB Workshop

Dear Mr. Calavita,

CRC Industries, Inc. appreciates the opportunity to comment on the 11/10/2020 Workshop presented by webinar from CARB on Amendments to the Consumer 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.

General Comments

CARB Staff has spent significant time and resources on the amendments. CRC appreciates the staff making time to discuss these important issues with our company.

Energized Electrical Cleaner

This category is of significant importance to those who work on energized electrical equipment. The new wording that CARB has proposed for this category will ensure continued availability of safe and effective products for use around energized electrical equipment. CRC supports this new language for the category definition.

Web based claims

CRC supports the staff's position to delay work on amending the definition of label to include web-based claims. This is an extremely complex issue. More time is needed to work out this issue.

Conclusion

CRC appreciates staff's work on these amendments and can support both the new definition change for Energized Electrical Cleaners and the delay of adding web-based claims to the label definition.

Thank you for this opportunity to comment.

Sincerely,



Michelle Rudnick

Director of Regulatory Affairs

CRC Industries, Inc.

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