



February 26, 2020

Lori Miyasato, Ph.D.
Panel Liaison - Air Resources Board
P. O. Box 2815
1001 "I" Street
Sacramento, California 95812

Dear Ms. Miyasato:

The National Roofing Contractors Association (NRCA) supports the concerns expressed by the Roof Coatings Manufacturers Association (RCMA) and the American Coatings Association (ACA) regarding the Office of Environmental Health Hazard Assessment draft document entitled "p-Chloro- α,α,α -trifluorotoluene (p-Chlorobenzotrifluoride, (PCBTF) Cancer Inhalation Unit Risk Factor Technical Support Document for Cancer Potency Factors: Appendix B (October 2019).

Since 1886, NRCA has been the home for generations of entrepreneurial craftsmen and enterprises who shelter and protect America's families and businesses and each other. Our vision is the recognition of our members as professionals and to unite the industry to that purpose. NRCA is one of the construction industry's most respected trade associations, representing over 3,600 members in all segments of the roofing industry, including contractors; manufacturers; distributors; architects; consultants; engineers; building owners; and city, state and government agencies.

NRCA urges the Air Resources Board to carefully consider the impact its decisions have when considering PCBTF, especially as it pertains to the comments articulated by RCMA and ACA. Roofing contractors operate under significant regulatory restrictions for many appropriate reasons; however, adding to them unnecessarily will adversely impact them and the consumers who rely upon them for quality products and services at affordable rates. NRCA urges you to thoroughly assess all available information and welcomes the opportunity to provide assistance to all organizations engaged in this endeavor.

Sincerely,

Thomas R. Shanahan, CAE
Vice President, Enterprise Risk Management

NATIONAL ROOFING CONTRACTORS ASSOCIATION