



PLZ Aerospace Corporation
2651 Warrenville Rd., Suite 300
Downers Grove, IL 60515
Phone: (630) 543-7600
www.plzaeroscience.com

March 18, 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,

PLZ Aerospace Corporation (PLZ) appreciates the opportunity to provide comments on the Initial Statement of Reason (ISOR) for the Consumer Products VOC Regulation.

PLZ commends the staff for their diligence in developing these amendments. PLZ worked closely with CARB staff on several issues during this rule development. We appreciate the fact that the staff was always open to working with us and made themselves available for numerous meetings in person and virtually.

PLZ is a manufacturer and marketer of consumer products with multiple manufacturing locations throughout the State of California. PLZ manufacturers products in every category under consideration in the current rulemaking.

PLZ makes the following comments by category:

Air Fresheners

PLZ appreciates the openness of CARB staff in dealing with the creation of niche categories and their respective VOC limits. Both the Concentrated Aerosol Air Freshener and the Total Release Aerosol Air Fresheners are now niche categories. While these categories are very small in size, these niche categories are important to the Consumer for they perform a much needed function. The definitions created define these new categories well and the VOC limits while technologically challenging, can be met.

Hair Finishing Spray

PLZ worked with staff on the VOC limits for Hairsprays. We appreciated that CARB staff removed the future effective limit for the Hairspray category. The future effective limit presented serious technological feasibility challenges. PLZ supports the 50% proposed VOC limit.



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Dry Shampoo

PLZ collaborated with CARB staff on the VOC limits for Dry Shampoo. We appreciate the removal of the proposed lower future effective limit of 45% VOC as it presented technological and commercial feasibility challenges. The current future effective limit of 50% VOC will be challenging, but PLZ can support the proposed 55% VOC limit and the future effective limit of 50%.

Crawling Bug Pesticide

PLZ greatly appreciates the multiple changes that occurred on the proposal for this category. Moving to one new regulation versus the initially proposed two prevents the burdensome task of registering products with the EPA twice. PLZ also appreciates the movement from the initial proposed VOC limits and the separation and creation of the Bed Bug category from the Crawling Bug category that was initially proposed. PLZ supports the new definitions and limits for these pesticide categories.

Monoterpenes

PLZ supports the 0.25% exemption for monoterpenes in General Purpose Cleaner non-aerosol and General Purpose Degreaser non-aerosol. This is a good solution to an issue that has been active for several years now. The staff should be commended for their proposal.

Addition to MIR Table

PLZ supports the proposal to add diethyl carbonate, 1-chloro-3,3,3-trifluoropropane, HFO-1233zd and alkane mixed-minimally 90% C13 and higher to the MIR table of Values. PLZ supports and encourages the use of Reactivity in future rulemakings.

Innovative Product Exemption (IPE)

PLZ appreciates the staff for their creative thinking with the proposed IPE on Compressed Gases to lower the use of GWP compounds. However, as written PLZ cannot support this proposal. Currently, the proposal is unclear and confusing making the provision unworkable. Within the proposal there is no calculation to determine how to obtain 50% reduction in GWP compounds. Likewise, there is no calculation to determine the ozone formation potential of a new product. Thus, we believe the provision to be unenforceable.

PLZ does support the National Aerosol Association (NAA) IPE provision using Reactivity. The NAA proposal, unlike the Compressed Gas proposal, provides examples and calculations on how the provision could work. The use of Reactivity has successfully been used by CARB to regulate Aerosol Coatings and Multi-purpose lubricants. This prior work shows Reactivity is a known concept to CARB. In addition, the use of Reactivity will provide additional flexibility for the manufacturer to reformulate products using compressed gas propellants. We believe the NAA proposal is a viable provision and should be considered by CARB.



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Conclusion

PLZ appreciate the staff's openness and willingness to meet with us either in person or virtually to discuss all of the issues. We believe the Aerosol Air Freshener categories are well defined and the VOC limits are possible. We thank the staff for their work on the Haircare products. Unfortunately, at this time we cannot support the staff's IPE on compressed gas. Possibly with some clarification the provision would be feasible. PLZ does respectfully request the Board to instruct the staff to include the NAA proposal into the regulation. Both of these two issues can be dealt within a 15-day comment period.

Thank you in advance for considering our comments. For additional questions or clarification, please feel free to contact our consultant Doug Raymond at (440) 339-4539 or at djraymond@me.com

Sincerely,

A handwritten signature in black ink that reads "William Wood". The signature is written in a cursive, flowing style.

William Wood
Vice President, Product Compliance and Strategic Projects
PLZ Aeroscience Corporation

cc: ravi.ramalingam@arb.ca.gov
joe.calavita@arb.ca.gov
josh.berghouse@arb.ca.gov
david.edwards@arb.ca.gov
jose.gomez@arb.ca.gov