March 19, 2021

Clerk’s 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 Aeroscience appreciates the opportunity to provide comments on the Initial Statement of Reason (ISOR) for the Consumer Products VOC Regulation.

PLZ is a manufacturer and marketer of aerosol and liquid consumer products. Shield Packaging of California is a business within PLZ Inc that is a formulator and packager aerosol personal care products in the State of California.

Shield has the following comments on the Amendments to the Consumer Product Amendments.

**Comments**

Shield supports the VOC limits for the Hairspray category and the Dry Shampoo category. Shield met several times with the staff to discuss these categories. We even had an on-site visit from the staff to discuss our concerns with the categories. CARB staff was always willing to discuss the categories with Shield.

Shield appreciates CARB's interest in creative measures to reduce emissions from consumer products. The most recent Innovative Product Exemption (IPE) compressed gas alternative is a good example of these measures. However, we all know that only one marketer is pursuing that option.

Shield wants to go on record that this IPE for compressed gas has potential downsides. One being increasing packaging which contradicts CalRecycle's efforts to reduce single use packaging. Another reason is that we believe based on work done using nitrogen as the propellant that consumers will lose internal pressure in the can and may dispose of the product before the liquid portion in the container is used up thus adding to the hazardous liquid waste stream. The negatives to compressed gas were shown during your on-site visit. The manufacturing process of charging aerosol cans with nitrogen presents safety concerns since a very small amount of nitrogen increases internal pressure of the can exponentially. Aerosol cans can easily burst in the manufacturing process. These concerns to compressed

gas was discussed during your on-site visit. Our most recent concern is product performance which may result in short lived consumer acceptance to the nitrogen technology.

Our last comment is that we are asking that "reactivity" remain an option for consumer products like hair sprays and dry shampoos. It is one more alternative that may help reduce consumer product emission reductions. The National Aerosol Association (NAA) proposed IPE shows how a Reactivity provision in the IPE could be successful in the reduction Global Warming Potential (GWP) compounds and provide greater flexibility to the manufacturer. The Reactivity concept needs to be incorporated.

**In Conclusion**

Shield appreciates the staff cooperation in developing these amendments. Unfortunately, at this time Shield cannot support the Compressed Gas IPE as written. Lastly, CARB staff should add an option for using Reactivity in the IPE provision. Both the Compressed Gas IPE and Reactivity Option IPE could be dealt with in the 15-day comment period.

Thank you for your consideration to these comments. Any questions or comments please feel free to contact Bill Wood, Vice President Product Compliance and Strategic Projects @ 816-564-5969 or bwood@plzaeroscience.com.

Sincerely,



Steve Dickstein

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