

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:

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

Aeropres Corporation is a major supplier to the Consumer Products Industry and distributes many products helping formulators achieve current regulations. Aeropres supplies Liquefied propellant as well as HFC-152a and HFO-1234ze to the Aerosol Industry. Aeropres has been in business since 1973 and has a facility in the South Coast Air Quality Management District. Aeropres has worked closely with CARB staff over the last three decades to develop Consumer Product VOC regulations that allow manufacturers to produce efficient and effective products while achieving much needed emission reduction to achieve the states Clean Air Goals. Our comments on this most recent rulemaking are the following.

#### **Addition of Compounds to the MIR Table**

Aeropres has been a proponent of the Concept of Reactivity since the early 1990's. Reactivity is sound science. Aeropres supports the addition of HFO-1233zd to the MIR Table of Values.

#### **Innovate Product Exemption (IPE) Provision**

Aeropres commends the staff for trying to provide flexibility to the regulation through the Compressed Gas IPE. Unfortunately, after closer review the current language in the IPE provision is confusing and unclear. If CARB staff were to clarify the volume and ozone formation potential issues, then the provision would begin to be clearer. Perhaps adding calculations to these two criteria would clarify the issue. Aeropres was surprised that staff proposed this complicated provision so late in the rule development process. This left Industry very little time to comment on this provision.

Aeropres was also disappointed that the staff did not incorporate the National Aerosol Association (NAA) IPE proposed provision on Reactivity into the proposed language for the amendment. This language was submitted to the staff 30 days after their compressed gas provision. The NAA IPE provision uses Reactivity to reduce the use of Global Warming Potential (GWP) compounds. The use of Reactivity has been a viable way to reduce VOC

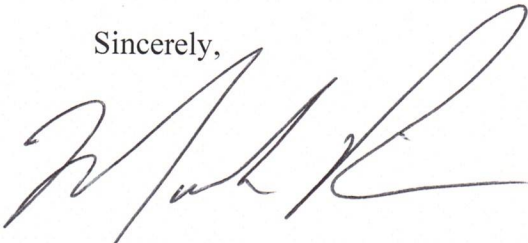
emission and is sound science. The staff has used Reactivity for Aerosol Coatings and Multi-purpose lubricants. The use of Reactivity allows for more flexibility in for formulating while maintaining crucial emission reductions. Staff should incorporate this language into the regulation.

**Conclusion**

Aeropres supports the inclusion of the compound into the MIR Table. At this time Aeropres cannot support the Compressed Gas IPE due to the fact it lacks clarity. Aeropres requests that the Board direct staff to incorporate the NAA provision to the IPE or an alternate Reactivity scheme for the IPE. Both can be accomplished in a 15-day comment period.

Thank you in advance for considering our comments. Any questions or comments feel free to contact me at 318-464-6808 or at [mrivers@aeropres.com](mailto:mrivers@aeropres.com)

Sincerely,



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