

September 3, 2021

Clerk's Office
California Air Resources Board
1001 I Street
Sacramento, California 95814
<https://www.arb.ca.gov/lispub/comm/bclist.php>

Submitted via the web portal

Subject: Comments on the Proposed Amendments to the Antiperspirants and Deodorants Regulation; Consumer Products Regulation; Aerosol Coating Products Regulation; Alternative Control Plan Regulation; the Tables of Maximum Incremental Reactivity Values; and Test Method 310 August 19, 2021

Dear Mr. Ramalingam,

Honeywell International Inc. (Honeywell) appreciates the opportunity to provide comments on the California Air Resources Board's (CARB) 15-Day notice of proposed changes to the Amendments adopted in March 2021 to the Consumer Products regulations.

Honeywell is a global leader in providing technologies and innovations that can help the world solve its environmental and energy challenges. Our Fluorine Products business is a recognized leading innovator in the development of environmentally preferable fluorocarbons for use as aerosol propellants, solvents, refrigerants, foam blowing agents, and other uses. Since the 1990s, we have helped businesses replace ozone-depleting substances in these applications with alternatives that have less impact on the stratospheric ozone layer and climate change.

Honeywell supports CARB's efforts to adopt sensible regulations to achieve additional volatile organic compound (VOC) emission reductions for the state. Honeywell offers comments on just one section of the proposed 15-day changes.

Section 94511 Innovative Products

Honeywell supports the proposed Innovative Products Exemption (IPE) concept to allow the use of Liquefied Propellants and the use of an Ozone Forming Potential (OFP) metric to regulate the following aerosol products: Hair Finishing Spray, Dry Shampoo and Personal Fragrance. Allowing manufacturers to use a Liquefied Propellant to demonstrate compliance will allow more flexibility in their reformulation of the products to meet the stringent VOC limits. The use of (OFP), which will use the MIR scale for compounds, also allows much needed additional flexibility to the manufacturers. This provision of the IPE provides manufacturers with a workable compliance option while allowing CARB to monitor and ensure that the needed VOC

emissions reductions are achieved. The proposal supports industry innovation without sacrificing environmental policy objectives.

Honeywell believes this concept should be expanded in the future to allow all other product categories to utilize this provision, encouraging further use of OFP as an alternative to the VOC limit. The use of MIR is sound science and should be allowed for more product categories. This new approach could also reduce greenhouse gas emissions as well as other conventional pollutant emissions.

Summary

In closing, Honeywell supports the proposed Innovative Product Exemption Amendments and encourages staff to expand this concept to other categories. Honeywell commends the staff for their work in this area and their willingness to engage stakeholders to develop a sensible regulation that achieves critical environmental objectives.

Thank you for your consideration to these comments.

Respectfully submitted,

DocuSigned by:

BD73C6D9E17C4A3...
Laura Reinhard, Vice President & General Manager
Foam & Industrial Products
Honeywell

Cc: Ravi.Ramalingam@arb.ca.gov
joe.calavita@arb.ca.gov
josh.berghouse@arb.ca.gov
jose.gomez@arb.ca.gov