



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>

**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

WD-40 Company 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.

The WD-40 Company is a California company that markets Consumer Products. WD-40 Company has worked extensively with CARB to improve the Air Quality of the State of California. CARB has been a leader in directing the Consumer Product Industry to innovate their products to reduce VOC emissions. WD-40 Company and CARB have a shared interest to clean the air for California.

Our comments today are solely on the Innovative Product Exemption (IPE)

#### **Section 94511 Innovative Products**

WD-40 has long supported the concept of Reactivity or Ozone Forming Potential (OFP) through the use of Maximum Incremental Reactivity (MIR) which this provision uses. WD-40 strongly supports the inclusion of the Liquefied Propellant Product into this provision. Adding Liquefied Propellant products to the Innovative Product Exemption (IPE), provides flexibility to the manufacturers of Hairspray, Dry Shampoo and Personal Fragrance to reformulate their products without the need to add significant amounts of Greenhouse Gases (GHG's). Even though WD-40 does not produce any of these product categories, WD-40 supports the use of MIR as a tool to regulate ozone.

WD-40 suggests that the staff expand this provision to other product categories. The use of this provision could reduce the need for GHG's or could be utilized to reduce toxic compounds.

#### **Summary**

WD-40 believes MIR is the best scientific method to regulate ozone. The Liquefied Propellant Product provides much needed flexibility to reformulate without the need to increase GHG's.



In addition, this provision allows the staff to ensure the much-needed emissions are maintained. WD-40 Company supports the IPE provision.

Thank you for your consideration to these comments. Any questions or comments feel free to contact our Consultant Doug Raymond at [djraymond@reg-resources.com](mailto:djraymond@reg-resources.com) or at 440-339-4539.

Respectfully,

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9/2/21

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