



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

Stoner Incorporated 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.

Stoner Incorporated is a manufacturer of Consumer Products and has a long history working with CARB staff. Stoner is requesting that the California Air Resources Board (CARB) provide a Reactivity compliance Option for the Consumer Products in the current rule development.

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

Section 94511 Innovative Products

Stoner Inc. supports this section and the addition of the Liquefied Propellant Product. Stoner believes the use of Maximum Incremental Reactivity (MIR) is the best scientific method to regulate ozone. 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). Stoner Inc. does not produce these personal care products, but believes this provision is a good step forward for the use of Ozone Forming Potential (OFP).

Stoner Inc. strongly urges the staff to expand this provision to include other product categories in the future. The CARB VOC limits are the most stringent in the world. This provision could add flexibility to manufacturers of the product categories to produce more effective products. The use of this provision could also reduce the need for GHG's or could be utilized to reduce toxic compounds.

Summary

Stoner supports the use of MIR and OFP in regulating ozone. Stoner urges staff to expand this provision in the future to include other product categories. This provision is a win for the manufacturers and a win for the state.



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

Sincerely,

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

Robert W. Sweger, Ph.D.
R&D Director
Stoner Incorporated

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