



Pure Innovation with **YOU** in mind.

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September 3, 2021

Clerk's Office  
California Air Resources Board  
1001 I Street  
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<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

Diversified CPC 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.

Diversified CPC is a manufacturer/distributor of premium propellant systems to the Aerosol Industry. Diversified has worked with the California Air Resources Board (CARB) for 31 years on the regulation of Consumer Products. CARB has been a leader in the field of Consumer Product VOC regulation.

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

**Section 94511 Innovative Products**

Diversified supports the addition of Liquefied Propellant Product into the IPE. Using Ozone Forming Potential (OFP) is the most 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).

Diversified also urges the staff to expand this provision in the future to other product categories. This flexibility will assist other product categories in reformulating to provide more effective and efficient products to the public. Other product categories could benefit from this provision to reduce GHG but also to possibly reduce the use of toxics as well.

This provision is a win for the manufacturer, the State and thus a win/win.

### Summary

Diversified commends the staff for their availability to meet with the industry. In addition, the staff has developed an Innovative approach to deal with the GHG issue. Diversified strongly 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.

Sincerely,



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