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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

PLZ Aerospace Corporation (PLZ) 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.

PLZ is a manufacturer and marketer of consumer products with multiple manufacturing locations throughout the State of California. PLZ manufacturers products in every category under consideration in the current rulemaking.

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

Section 94511 Innovative Products

PLZ has worked with the staff on this provision. PLZ supports the addition of the Liquefied Propellant Product into the IPE. 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). The use of Maximum Incremental Reactivity (MIR) is the most scientific method to regulate ozone. This provision is a good start on moving toward using Ozone Forming Potential (OFP) for regulating product categories.

PLZ urges the staff to make this provision available to other product categories in the future. The use of this provision benefits the manufacturer by providing flexibility in reformulation and benefits the state in maintaining emission reduction thus a win/win.

Summary

PLZ supports the IPE provision and commends the staff for their availability to meet on these important issues. PLZ looks forward to continuing to work with staff on future issues.



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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 or at 440-339-4539.

Sincerely,

A handwritten signature in blue ink, appearing to read "John Davis". The signature is fluid and cursive, with the first name "John" and last name "Davis" clearly distinguishable.

John Davis
Senior Vice President, Technical Services
PLZ Aerospace Corporation

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