

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

Aeropres Corporation 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.

Aeropres Corporation is a major supplier to the Consumer Products Industry and distributes many products helping formulators achieve current regulations. Aeropres has been in business since 1973 and has a facility in the South Coast Air Quality Management District. Aeropres has long been a supporter of the Concept of Reactivity. Aeropres was active in the development of the Aerosol Coating regulation that uses Reactivity.

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

Section 94511 Innovative Products

Aeropres strongly supports the addition of 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). Using Maximum Incremental Reactivity (MIR) is the most scientific method for ensuring valuable VOC emissions are maintained. Aeropres has long been a supporter of the use of Reactivity and supports the use of Ozone Forming Potential (OFP) used in this provision. This will provide the manufacturers of Hairspray, Dry Shampoo and Personal Fragrance an innovative pathway to reformulate their products to meet the stringent VOC limits.

However, Aeropres strongly urges the staff to expand this provision to other product categories to provide flexibility. 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 for the public.

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Summary

Aeropres 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. Aeropres 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 or at 440-339-4539.

Sincerely,



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