



September 3, 2021

Clerk's Office
California Air Resources Board
1001 I Street
Sacramento, CA 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

The National Aerosol Association (NAA) 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 NAA is an industry group devoted to serving the public's health, safety, and hygiene needs through the aerosol product form. The NAA represents marketers, manufacturers, fillers, and suppliers to the aerosol market.

Section 94510 Exemption

NAA supports the proposed update for the General-Purpose Cleaners & Degreasers non-aerosol, manufactured before January 1, 2023, containing fragrances.

Also, NAA supports the inclusion of the Monoterpenes table listing the specific chemicals and Chemical Abstract Service (CAS) numbers. This adds clarity to the regulation.

Section 94511 Innovative Products

NAA is in strong support of this section and the addition of the Liquefied Propellant Product. Adding Liquefied Propellant products to the Innovative Product Exemption (IPE) provides flexibility to the manufacturer to reformulate their products without the need to add significant amounts of Greenhouse Gases (GHG). Also, this section relies on the use of Maximum Incremental Reactivity (MIR), which also provides flexibility to the manufacturer. The use of MIR is the most accurate scientific method for ensuring that valuable VOC emissions are maintained.

This new Innovative approach to regulation benefits manufacturers by allowing much-needed flexibility to reformulate products. It benefits consumers because the flexibility afforded to manufactures allows them to design efficient and effective products for the public to use. It also benefits California because it guarantees the much-needed emission reduction for the state. This is truly a win for the manufacturers, a win for the public, and a win for the state.

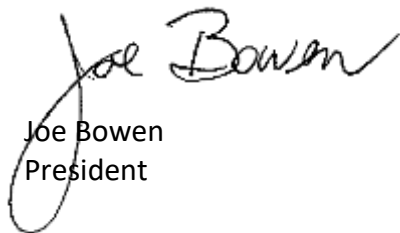
Summary

NAA commends the staff for their continued availability to discuss the IPE concept. This section will allow manufacturers an alternative to using GHG to reformulate. In addition, the exemption section clarifies the use of monoterpenes usage. Again, NAA supports these two sections of the 15-day notice.

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,

National Aerosol Association

A handwritten signature in black ink that reads "Joe Bowen". The signature is written in a cursive style with a large, looping initial "J".

Joe Bowen
President

cc: Ravi.Ramalingam@arb.ca.gov
joe.calavita@arb.ca.gov
josh.berghouse@arb.ca.gov
jose.gomez@arb.ca.gov