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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

Raymond Regulatory Resources (3R), LLC 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.

3R is a consulting firm for numerous consumer product manufacturers and suppliers as well as the consultant for the National Aerosol Association (NAA). 3R has been involved with this rule making since its inception in 2019. We have the following comments.

Section 94510 Exemption

3R supports the proposed update for the General-Purpose Cleaners & Degreasers non-aerosol, manufactured before January 1, 2023, containing fragrances.

Also, 3R 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

3R is in strong support of this section and the addition of the Liquefied Propellant Product. 3R has long been a proponent of the Concept of Reactivity which the IPE utilizes for the Liquefied Propellant Product section. The use of the IPE for controlling Ozone Potential Formation allows CARB to closely monitor this new innovative process.

Adding this provision allows manufacturers to reformulate their products without the need to add significant amounts of Greenhouse Gases (GHG's). This provision also adds flexibility to the manufacturer in the reformulation process.

Staff should be commended for their forward-thinking approach to the GHG issue. In addition, this provision will provide manufacturers much needed flexibility to reformulate products to maintain efficient and effective products for the public to use, while maintaining 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. Thus, a win, win, win.

Modifications to Test Method 310

4 Calculation of VOC content

3R supports the language added on ammonia. This language clarifies the role of ammonia in the calculation.

Summary

3R Supports the changes to section 94510, 94511 and Method 310. Staff has always been available for discussions on the rule development. 3R appreciates this availability and commends the staff on continuing to work to make this a better regulation.

Thank you for your consideration to these comments. Any questions or comments please feel free to contact me at djraymond@me.com or at 440-339-4539.

Sincerely,



Douglas Raymond
President

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