September 17, 2013

Clerk of the Board

California Air Resources Board

1001 I Street

Sacramento, CA 95912

 *via* web portal - http://www.arb.ca.gov/lispub/comm/bclist.php

RE: Proposed Amendments to the Consumer Products Regulations

Clerk of the Board:

Aeropres Corporation appreciates the opportunity to comment on the amendments to the Consumer Products regulation. These amendments are to be heard by the California Air Resources Board on September 26, 2013.

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 these specific comments on the amendments:

* Aeropres supports the inclusion of the HFO-1234ze compound into the definition for VOC, as an exempt VOC compound for both the Antiperspirants and Deodorants Regulation and the Consumer Products Regulation. The US EPA has exempted this compound as a VOC. CARB staff has reviewed this compound and determined that the HFO-1234ze compound has negligible impacts on ground-level ozone as well as a low GWP, no ozone depleting potential and has been determined to have no adverse health impacts. This compound is nonflammable as well. By CARB exempting this compound, it provides another tool for the industry to use for reformulation.
* Aeropres supports the CARB staffs’ scientific approach to the Low Vapor Pressure (LVP) definition issue. The Industry has invested significant dollars in research and development to utilize LVP compounds to improve the Air Quality in the State of California.

In conclusion we appreciate the staff’s willingness to review Industry’s technical data. We support the amendments above to the Consumer Products Rule.

Thank you for your consideration to these comments. Any questions or comments feel free to contact our consultant Doug Raymond at 440-474-4999 or at djraymond@reg-resources.com.

Sincerely,

Mark Rivers

Vice President Technical Services

Aeropres Corporation

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Cc: Carla Takemoto, Air Resources Board

 Doug Raymond, Raymond Regulatory Resources (3R), LLC