



PRODUCTS CORPORATION

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April 18th, 2020

Joe Calavita
Manager, Consumer Products Implementation Section
California Air Resources Board, AQPSD
P.O. Box 2815
Sacramento, CA 95812

Subject: Reactivity in Consumer Products

Dear Mr. Calavita,

Spray Products Corporation is aerosol filler and has worked with the California Air Resources Board (CARB) on the development of VOC regulations for Consumer Products for years. Spray Products recognizes CARB as the leader in Consumer Product VOC regulation.

Spray Products urges CARB to consider reactivity as a compliance option in the current rule making. Reactivity is sound science. The reduction of the Maximum Incremental Reactivity (MIR) of a product always leads to a reduction in ozone production. Mass based regulations do not always reduce ozone production from a product. Currently it does not appear likely that MIR limits can be developed to meet California's State Implementation Plan (SIP) commitments for 2023. However, MIR limits could be developed as a compliance option for 2031 SIP commitments.

Reactivity has been implemented by CARB for aerosol coatings for over 18 years. Recently CARB adopted reactivity compliance option for multi-purpose lubricants. Reactivity has also been implemented by the US EPA on Aerosol Coatings. Spray Products supported the use of reactivity for these products. Reactivity provides the manufacturers/marketer flexibility in reformulation of their products. Reactivity also creates more flexibility to develop effective products while obtaining emission reduction.

Industry supplied three years of data including reactivity data to CARB staff. This information was supplied in good faith with the thought that CARB would use this data to provide a more productive rule making. Moreover, Industry should be the one to decide how best to regulate our products. CARB is in possession of all of the reactivity data to regulate our products. This data should be given back to the Industry. If a

reactivity limit can be used to achieve an equivalent VOC reduction and provide Industry with flexibility then this is a win for the Agency and a win for the Industry.

Spray Products requests CARB to consider reactivity as a compliance option for this rule making. Throughout the rule making reactivity has been discussed. As of November 7, 2019, in the CARB staff power point the issue of reactivity consideration was proposed, recognizing reactivity should be considered.

Thank you for your time and consideration to this issue. Any questions or comments please contact our consultant Doug Raymond at 440-339-4539 or at djraymond@me.com.

Sincerely,

Bart Bastian
President

Cc: Ravi Ramalingam
Dave Edwards
Doug Raymond