



April 1, 2020

VIA EMAIL [Ravi.ramalingam@arb.ca.gov, joe.calavita@arb.ca.gov]

Ravi Ramalingam – Branch Chief, Joe Calavita – Section Manager
California Air Resources Board
Air Quality Planning and Science Division
P.O. Box 2815
Sacramento, CA 95812

Dear Sirs,

As a representative of Amway Corp./Access Business Group, a consumer products company with significant sales in California, we are writing you today to urge the California Air Resources Board (“CARB”) to include reactivity limits in upcoming rulemaking for the Consumer Products Regulation as an alternate way of calculating air quality improvement. Specifically, we request that CARB allow companies the choice to use either VOC limits or a maximum incremental reactivity (MIR) reduction approach in measuring/complying with emission limits.

While we understand that allowing a reactivity option by 2023 is not feasible at this point, we respectfully request inclusion of this alternative approach by 2027 for specific categories such as Hair Finishing Spray and Dry Shampoo (which are both important categories for our company and Industry as a whole). Our rationale for this request is as follows:

I. A MIR reduction alternative will benefit California residents.

- Industry wants to partner with CARB to reduce ozone, and to that end, we remind CARB that the reduction of the MIR of a product will always lead to a reduction in ozone. On the other hand, mass-based VOC reductions do not always reduce ozone production. Therefore, a reactivity approach has the potential to have a greater impact on ozone reduction.
- A choice of using MIR reductions would give manufacturers more flexibility in formulations, with a greater chance of successful performance and consumer satisfaction.

II. Reactivity has a precedent of use in California and at the Federal level.

- CARB has already implemented reactivity for Aerosol Coatings over 18 years ago and has also recently adopted it for Multi-purpose Lubricants.
- Recognizing the scientific benefits, the US EPA has implemented reactivity for Aerosol Coatings as well.

Industry has already supplied three years of data (including reactivity data) to CARB and is more than willing to work with CARB to provide additional information and test methods for CARB to regulate these products under the reactivity approach. In the meantime, we request that this existing reactivity data be released to Industry with the goal of developing reactivity equivalent VOC values for specific product categories. It is important to understand that it is difficult for manufacturers to fully assess the potential of the reactivity approach without this data and input. We truly believe that further work in this area will provide a benefit to everyone concerned, and primarily to the residents of California.

Thank you in advance for your thoughtful consideration of this request. We appreciate CARB's willingness to work with Industry on the proposed rulemaking and look forward to the next phase.

Sincerely,


E.J. Glaza
Director, Regulatory Affairs