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Subject: Use of Reactivity

Diversified CPC International is a manufacturer/distributor of premium propellant systems to the Aerosol Industry. Diversified has worked with the California Air Resources Board (CARB) for 30 years on the regulation of Consumer Products. CARB has been a leader in the field of Consumer Product VOC regulation.

Diversified has been a supporter of CARB in the use of Reactivity. Reactivity is sound Science. CARB has achieved significant improvements in Air Quality in California. Reactivity should be a compliance option for the current rulemaking. It is understandable that Maximum Incremental Reactivity (MIR) limits cannot be developed for 2023 California State Implementation Plan (SIP) requirement. However, for 2031 SIP requirements, there is a significant amount of time to develop MIR limits.

Reactivity has been implemented by CARB for Aerosol Coatings for over 18 years. Just recently adopted for Multi-purpose lubricants. Also, Reactivity has been implemented by US EPA on Aerosol Coatings. Reactivity provides the manufacturer/marketer flexibility in reformulation of their products. Reactivity also creates more flexibility to develop effective products while obtaining emission reduction.

Throughout the rule making, Reactivity has been discussed. As of November 7, 2019, in the staff Power Point the issue of Reactivity consideration was proposed. Then on March 10, 2020, due to a question that was asked by industry, the staff admitted that no Reactivity limits would be proposed. This was the first time this was announced. Nearly 10 months into the rule making this announcement was made publicly.

Diversified urges CARB to provide Reactivity as a compliance option for the 2031 SIP commitments. As a leader in the effort to improve Air Quality, Reactivity is the best science option.

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](mailto:djraymond@me.com).

Sincerely,

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