



March 31, 2020

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

Subject: Use of Reactivity

The Aeropres Corporation is a manufacturer/supplier of high-quality propellants for the Aerosol Industry. Aeropres has been involved with the regulation of Consumer Products since the California Air Resources Board (CARB) began regulations 30 years ago. CARB has always been at the forefront of technology to regulate consumer products, such as Reactivity.

Aeropres respectfully requests CARB consider the use of Reactivity as a compliance option for the consumer product categories being regulated in this rulemaking. Aeropres has been involved in promoting the use of Reactivity in Consumer Products for more than 25 years. Our former (now retired) Vice President of Technical Services, Harry McCain Ph.D., was one of the pioneers in the Industry pushing this concept. Reactivity is sound science. The reduction of the Maximum Incremental Reactivity (MIR) of a product always leads to a reduction in ozone. Mass based regulations do not always reduce ozone production from a product.

Aeropres was a supporter of CARB in the formation of the Aerosol Coating Regulation. Reactivity has been implemented by CARB for Aerosol Coatings for over 18 years. The US EPA has implemented Reactivity for Aerosol Coatings as well.

It was obvious at that time that Reactivity provides the manufacturer/marketer with flexibility in the reformulation of their products. Reactivity also creates more flexibility to develop effective products while obtaining emission reduction. Just recently the use of MIR limits has proven useful in the regulation of Multi-purpose Lubricant products. The use of Reactivity as a compliance option provided much needed flexibility to these manufacturers and marketers as well.

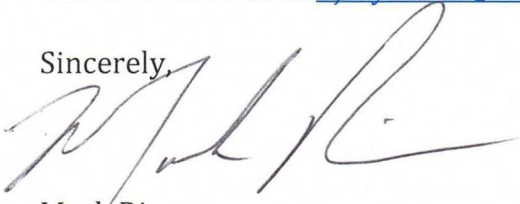
Aeropres has monitored this rulemaking. Throughout this rulemaking Reactivity has been discussed. As of November 7, 2019, in the staff Power Point, the issue of Reactivity consideration was proposed. Then on March 10, 2020, due to a question

that was asked from the Industry, CARB staff stated that no Reactivity limits would be proposed. This was the first time this was announced after nearly 10 months into the rulemaking.

Aeropres understands that it may not be possible to develop MIR limits to meet the 2023 SIP requirements but requests that CARB consider using Reactivity as an option for the 2031 requirements for VOC reductions. Aeropres looks forward to working with CARB on this issue.

Any questions or comments please contact me or our consultant Doug Raymond at 440-339-4539 or at djraymond@me.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark Rivers', written over a light blue horizontal line.

Mark Rivers
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Cc: Ravi Ramalingam
Dave Edwards
Doug Raymond