



April 2, 2020

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California Air Resources Board, AQPSD
P.O. Box 2815
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Subject: Reactivity a Science Based approach

Raymond Regulatory Resources (3R), LLC respectfully requests the California Air Resources Board (CARB) to reconsider its current position to not use Maximum Incremental Reactivity (MIR) for a compliance option in this current rule making for Consumer Products.

Throughout the rule making Reactivity has been discussed. As of November 7, 2019, in the Power Point given by CARB staff, the issue of Reactivity consideration was proposed. Industry has offered to work with CARB staff in providing information and tests for CARB to regulate these products under Reactivity. To date CARB staff has not asked for any information. Also, no information on Reactivity had been released. Fortunately CARB staff in late February agreed to provide Reactivity equivalent VOC values for the product categories. Thus, providing hope that Reactivity limits might be considered. Then on March 10, 2020, due to a question that was asked, 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. Throughout this process CARB has stated this is a transparent activity. Not sharing this intention was far from transparent.

3R has a long history of working with CARB staff on rule development for Consumer Products. 3R also has a long history on working with Reactivity. Reactivity is sound Science. The reduction of the MIR of a product ALWAYS leads to a reduction in ozone. Mass based regulations do not always reduce ozone production from a product. Reactivity provides the manufacturer/marketer flexibility in reformulation of their products. Reactivity also creates more flexibility to develop effective products while obtaining emission reduction. Reactivity has been implemented by CARB for Aerosol Coatings for almost two decades. In recent years CARB adopted a Reactivity Compliance Alternative Option for Multi-purpose lubricants to meet an

already adopted mass based VOC limit. In addition the US EPA used Reactivity for their VOC rule on Aerosol Coatings.

Reactivity has proven to provide a solution to meeting stringent VOC limits. 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 to the Industry. If a Reactivity limit can be used to achieve an equivalent VOC reduction and provide Industry with flexibility this is win for the Agency and a win for the Industry, meaning a win-win situation.

CARB as the leader in the world on Consumer Product VOC regulations should consider all options when attempting to meet California State Implementation Plan (SIP) commitments. Developing MIR limits for the 2023 SIP commitments would be nearly impossible at this late date in this rule development. However, CARB has significant time to develop a Reactivity compliance option for the 2031 SIP commitments. Even if mass based limits are adopted, alternative Reactivity limits could be developed afterwards. This was the case for the original Aerosol Coatings regulation. In addition the Multi-purpose lubricant regulation is mass based with a Reactivity compliance option. This type of regulation provides the Industry with the ultimate in flexibility to reformulate products. Industry needs all options to meet CARB's stringent limits.

3R has worked extensively with CARB to meet the common goal of improving California air quality and providing a technological and commercially viable regulation for manufacturer to produce effective products.

Thus in closing 3R requests that CARB reconsider its current stance on the use of Reactivity. CARB has always been a leader in this area, hopefully that will continue.

Thank you for your time and consideration to this very important issue. I look forward to working with you on this and future regulations. Any questions or comments please contact me at 440-339-4539 or at djraymond@me.com.

Sincerely,

A handwritten signature in black ink that reads "Douglas Raymond". The signature is written in a cursive, flowing style.

Douglas Raymond
President

Cc: Ravi Ramalingam
Dave Edwards
Doug Raymond