



April 1, 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 National Aerosol Association (NAA), respectfully requests the California Air Resources Board (CARB) to reconsider its position on the use of Reactivity limits in this current rulemaking.

The NAA was the first Association to support CARB in the use of Reactivity. Almost two decades ago the NAA urged and supported the use of Reactivity for Aerosol Coatings. The use of maximum incremental reactivity (MIR) limits provided greater flexibility for reformulating Aerosol Coatings. Then, in 2018, CARB again used a Reactivity option to grant Multi-purpose Lubricant manufacturers flexibility and a better way to comply with very stringent VOC limits.

Reactivity is sound Science. The reduction of the MIR of a product always leads to a reduction in ozone while mass-based regulations do not always reduce ozone production from a product. Reactivity provides the manufacturer/marketer more flexibility to reformulate and develop effective products while obtaining real, quantifiable emission reductions.

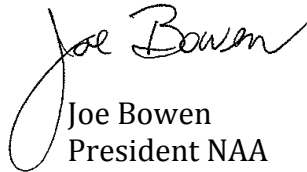
Throughout this rule making Reactivity was discussed. As of November 7, 2019, in the staff Power Point the issue of Reactivity consideration was proposed. In late February 2020, CARB staff agreed to provide Reactivity equivalent VOC values for the product categories, thus, providing hope that Reactivity limits would be considered. Then on March 10, 2020, due to a question that was asked by industry, the staff stated that no Reactivity limits would be proposed. This was the first time this was announced publicly - nearly 10 months into the rule making!

The NAA realizes that the use of Reactivity for 2023 is not viable. However, the use of Reactivity for the 2031 VOC reductions is viable. Reactivity should be a compliance option for this future date due to the magnitude of the VOC reductions needed.

In closing, the NAA respectfully requests that CARB reconsider the use of Reactivity in this rule making, especially for future effective VOC limits. Reactivity has been a valuable tool, used successfully more than once before, and has allowed for effective products to be formulated for consumers while also providing significant, quantifiable VOC reductions for cleaner air.

Thank you for considering our suggestion and NAA looks forward to working with you on 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,



Joe Bowen  
President NAA

Cc: Ravi Ramalingam  
Dave Edwards  
Doug Raymond