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April 2, 2020

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

Subject: Reactivity Compliance Option

PLZ Aerospace Corporation is a contract filler and marketer for the consumer products industry. As an industry leader, PLZ urges the California Air Resources Board (CARB) to provide a reactivity compliance option for consumer products in the current rulemaking. PLZ has worked with CARB to attain the common goal of improving air quality in California while maintaining the effective performance of our consumer products. CARB has been a global leader in the development of VOC consumer product regulations. As a leader, we request CARB to consider reactivity based limits for consumer products.

Reactivity has been implemented by CARB for aerosol coatings for over 18 years. CARB just recently adopted a reactivity compliance option for multi-purpose lubricants. Based on CARB's leadership, reactivity has been utilized by the US EPA for aerosol coatings. Reactivity is a sound science that has proven to be effective in helping with California's air quality issues. The reduction of the Maximum Incremental Reactivity (MIR) of a product always leads to a reduction in ozone. Mass based reductions of VOCs do not always lead to reductions in ground level ozone from consumer products. Having reactivity as a compliance option provides the manufacturer/marketer flexibility in the necessary reformulation of their products. This flexibility allows companies like PLZ the ability to develop effective products while obtaining the necessary emission reductions.

In the past Industry has supplied three years of reactivity data to CARB staff. This information was supplied in good faith with the thought that CARB would use this data to provide a more productive rule making. Industry should have a voice in how best to regulate our products. CARB is in possession of this reactivity data and this data should be shared with the Industry. If a reactivity limit can be used to achieve an equivalent mass based VOC reduction providing the industry with additional flexibility, this is a win for CARB, a win for the industry, and most importantly a win for California's air quality.

Throughout this process CARB has stated this is a transparent activity. Not sharing this collected data is far from being transparent. PLZ believes that reactivity should be a compliance option now and in the future. PLZ urges CARB to continue to lead in the area of VOC consumer product regulations and continue to provide this compliance option for the products being considered for regulation.



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Any questions or comments on this request, please feel free to contact our consultant Doug Raymond at 440-339-4539, or at djraymond@me.com.

Sincerely,

A handwritten signature in blue ink that reads "Bill Wood". The signature is written in a cursive, flowing style.

Bill Wood
Vice President, Product Rationalization

Cc: Ravi Ramalingam
Dave Edwards
Doug Raymond