



April 1, 2020

DRAFT

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

Subject: Reactivity for Consumer Products

Shield Packaging is a California based formulator and filler of aerosol products. Shield has worked closely with the California Air Resources Board (CARB) on past Consumer Product regulation developments. Reactivity is sound science. The reduction of the Maximum Incremental Reactivity (MIR) of a product always leads to a reduction in ozone production. Mass based regulations do not always reduce ozone production from a product. The use of Reactivity should be a compliance option for the current rulemaking development. Reactivity provides the manufacturer/marketer flexibility in reformulation of their products. Reactivity also creates more flexibility to develop effective products while obtaining emission reduction.

Given the stringent California State Implementation Plan (SIP) commitments 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 a win for the Agency and a win for the Industry meaning a win-win situation. Shield realizes the time is too short to develop MIR limits for the 2023 SIP requirements. However, there is time to develop MIR limits for the 2031 SIP commitments.

Reactivity was implemented by CARB for Aerosol Coatings over 18 years ago and has been in use ever since. Just recently it was adopted as a Reactivity compliance option for Multi-purpose lubricants. Also, Reactivity has been implemented by the US EPA on Aerosol Coatings. Thus providing an option of Reactivity would be a benefit to the Industry. This option will continue to assist CARB in obtaining their goal of Clean Air in California.

In closing Shield urges CARB to allow Reactivity as a compliance option for the Consumer Products rule making process.



Thank you for considering Reactivity. 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,

Roger R Vanderlaan
Vice President and General Manager

Cc: Ravi Ramalingam
Dave Edwards
Doug Raymond