



December 10, 2020

Via Email

Mr. Ravi Ramalingam  
Consumer Products & Air  
California Air Resources Board  
Sacramento, CA 95812-0806  
[jcalavit@arb.ca.gov](mailto:jcalavit@arb.ca.gov)

Subject: 11/10/2020 CARB Workshop

Dear Mr. Ramalingam,

The National Aerosol Association (NAA) has been following the development of amendments to the CARB Consumer Products VOC regulation since the beginning in 2019. The NAA is an industry group devoted to serving the public's health, safety and hygiene needs through the aerosol product form. The NAA represents marketers, manufacturers, fillers and suppliers to the aerosol market. The NAA appreciates all the work the staff has done on these amendments. The NAA has the following comments on the November 10, 2020, workshop that was held via webinar.

#### **General Comments**

NAA supports the staff's work on attaining the emission reductions needed to comply the State Implementation Plan (SIP) VOC emission reduction requirements. NAA has a long history of working with CARB to attain emission reduction while continuing to provide effective and efficient products

#### **Aerosol Air Fresheners**

NAA can support CARB combining the Single & Double Phase Aerosol Air Freshener categories into a single new category of Manual Aerosol Air Freshener. As well NAA supports the creation of three new Aerosol Air Freshener categories which are Automatic Aerosol Air Freshener, Concentrated Aerosol Air Freshener and Total Release Air Fresheners. These new categories were needed for these niche products due to the combination of the single and double phase categories. NAA appreciates the staff reviewing these products and providing the new categories.

NAA can support the new VOC limits and effective dates for these categories which are proposed as the following:

- Manual Aerosol Air Freshener 10% VOC by 2023 and 5% VOC by 2027
- Automatic Aerosol Air Freshener retain 30% VOC Standard
- Concentrated Aerosol Air Freshener 15% VOC by 2023 and 10% by 2027
- Total Release Air Freshener 25% by 2023



### Hair Care Products

Once again NAA appreciates the significant amount of time and resources that the staff spent working on these categories. NAA supports the following proposal.

- Hair finishing spray 50% VOC by 2023
- Dry Shampoo 55% VOC by 2023 and 50% VOC by 2029
- Hair Shine & Temporary hair color 50% VOC by 2029

For Dry Shampoo NAA supports the Personal Care Products Council (PCPC) comments to add the volume statements to the characteristic of the product performance.

### Non-Aerosol General Purpose Cleaners and Degreasers

NAA supports the 0.25% monoterpene exemption allowed for these two categories. The allowance of the monoterpenes for these categories will provide for more effective and efficient products to be made. Also, this should resolve the ongoing issue with the CARB Guidance document on the fragrance exemption.

### Innovative Product Exemption (IPE) for compressed gases

NAA appreciates the staff's attempt to provide alternative pathways for compliance for Hair Spray, Dry Shampoo and Personal Fragrance Products. Staff has discussed this issue in the past workshop. Providing this language in November of 2020 when this process began in May of 2019 is extremely late in the process. Given the Holidays this provides less than one month to provide meaningful comments to a very complex issue. Compressed Gases have been in existence forever. If these compounds could have been used commercially, they would have. The presentation that CARB provided on November 10 was neither technically nor commercially feasible. Given that CARB spent close to 5 years retrieving and reviewing formulations from the Industry and could not provide one feasible example is not a positive sign that this IPE's is workable. Next the wording provided for the IPE's is not clear thus not enforceable. NAA would be willing to partner with staff to try and develop a feasible IPE provision that could actually be used by Industry.

### Energized Electrical Cleaner

The NAA supports the staffs new proposed definition for this product category. The Energized Electrical Cleaner Products are safety products that are needed for working around Electrical Equipment that needs to be maintained while still being energized. Thus, there needs to be safety products available for this type of work that have high dielectric strength and are non-flammable.

The staff's new wording allows for the continued use of this product where this safety product is needed to work on Energized Electrical Equipment. NAA appreciates the staff's continued work on this issue to develop a reasonable solution to this important issue.

One additional item we feel is important to mention. The date that this new provision becomes effective needs to be addressed. We suggest that 1/1/2023 be the effective date.



### Aerosol PVC Pipe Cement

NAA supports the inclusion of the new category of Aerosol PVC Pipe Cement with a VOC limit of 60%.

### Web-based claims

NAA supports CARB's decision to delay consideration of adding web-based claims into the definition of label. The issue surrounding web-based claims are extremely complex. Websites are handled in various ways by different companies. A one size fits all will be very difficult to develop. Simply there is not enough time to develop a feasible way to regulate website claims. Also, many companies sell their products nationally or internationally. Thus, some claims on the website may be compliant for certain areas but not complaint in California.

### Addition to MIR Table

The NAA has long been a proponent for the use of Reactivity. The concept of Reactivity is the most efficient way to reduce ozone formation in consumer products. The reduction of an MIR value of a product is ALWAYS a reduction in ozone formation. However, a reduction in a mass-based VOC limit does not always result in reduction of ozone formation. NAA supports the addition of the following compounds:

- Diethyl Carbonate      MIR 0.71
- HFO-1233zd              MIR 0.04
- Alkane Mixed – minimally 90% C13 and higher carbon number      MIR 0.60

### Method 310

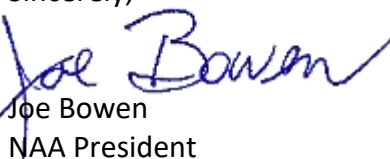
At this time NAA is still reviewing this proposal.

### Conclusion

NAA appreciates the opportunity to comment on these amendments. CARB staff is to be commended on their hard work on these amendments. NAA looks forward to working with CARB to finalize these amendments.

Any questions or comments feel free to contact our consultant Doug Raymond at 440-339-4539 or [djraymond@me.com](mailto:djraymond@me.com).

Sincerely,

  
Joe Bowen  
NAA President

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