



January 19, 2021

Mr. Joe Calavita  
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California Air Resources Board  
Sacramento, CA 95812-0806

Via electronic submission to [jcalavit@arb.ca.gov](mailto:jcalavit@arb.ca.gov)

Subject: GWP reduction IPE

Please find attached a modified proposal from the original proposal for an Innovative Product Exempt (IPE) provision. The changes to the regulatory language are consistent with discussions with CARB on the original IPE proposal.

The IPE Proposal being submitted will maintain the MIR value of the original product to ensure that valuable VOC reductions are secured without increasing the overall Global Warming Potential (GWP) of the consumer product. This proposal also allows CARB a commercially and technically feasible path to leverage the innovation of the consumer products industry to help CARB meet its goals.

The Reactivity concept is used in this IPE. Reactivity has been in use by CARB for Aerosol Coatings for close to two decades. Just recently Reactivity was used to provide an Alternative Option to comply for Multi-purpose lubricants. Reactivity reductions always provide a reduction in ozone formation unlike mass VOC reduction which may not always provide ozone formation reductions.

In summary NAA believes this IPE GWP reduction proposal provides more flexibility than the compressed gas IPE and has examples to prove that it is commercially and technologically feasible. NAA respectfully asks CARB staff to consider this proposal.

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

Sincerely,

A handwritten signature in black ink that reads 'Joseph B. Bowen'. The signature is written in a cursive style with a large, looping initial 'J'.

Joseph B. Bowen  
President