Proposed Amendments to the California Consumer Products Regulation

June 26, 2008

California Environmental Protection Agency

Air Resources Board

Presentation Overview

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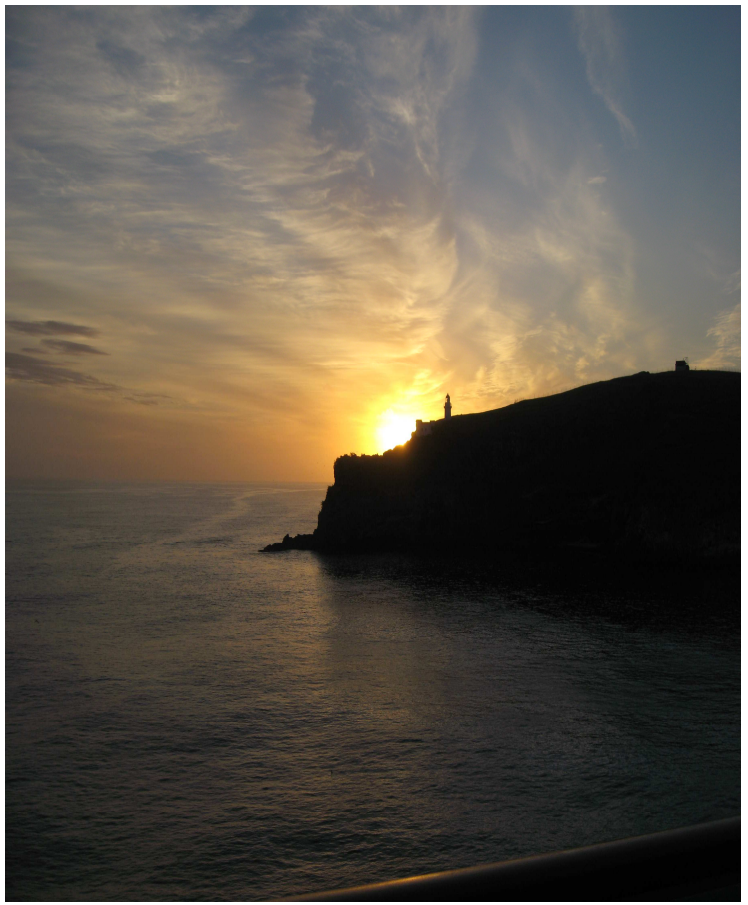


Mandate to Control Consumer Product VOC Emissions

- Health and Safety Code 41712
  - Achieve maximum feasible reduction in VOCs
  - Technologically and commercially feasible regulations
  - Preserve product forms
- VOC Statewide Strategy Commitment (SIP):
  - 30 to 40 tons per day by 2014

Consumer Products

- Chemically formulated
- Used by household and institutional consumers
- Include household, home and garden, aerosol paint, personal care, automotive maintenance products, etc.

Mandate to Control Consumer Product Greenhouse Gas Emissions

- Assembly Bill 32
  - Discrete Early Action Measure
  - Overall estimate is to achieve reduction of 0.25 MMT CO_2e

Proposed Amendments

- New and modified definitions
- New or lower VOC limits
  - 19 categories; 25 limits
  - VOC emissions reduced by about 5.8 tons per day
- VOC exemption: HFE 7200
- Toxics prohibitions in various categories
- Other regulatory proposals
- Global warming potential limit for Pressurized Gas Duster

Proposed Categories, VOC Limits, and Effective Dates

Product Category	Proposed VOC Limit (wt%)	Effective Date
Air Care Products		
Odor Remover/Eliminator * Aerosol Non-aerosol	 25 6	 12/31/2010 12/31/2010
Automotive Care Products		
Motor Vehicle Wash*	0.2	12/31/2010
Tire or Wheel Cleaner* Aerosol Non-aerosol	 8 2	 12/31/2010 12/31/2010
Windshield Water Repellent*	75	12/31/2010

* Previously unregulated category

Proposed Categories, VOC Limits, and Effective Dates

Product Category	Proposed VOC Limit (wt%)	Effective Date
Cleaners & Degreasers		
Dusting Aid		
Aerosol	17	12/31/2010
Non-aerosol	3	12/31/2010
Glass Cleaner		
Aerosol	10	12/31/2012
Pressurized Gas Duster*	1	12/31/2010
Fabric Care		
Carpet/Upholstery Cleaner		
Aerosol	5	12/31/2010
Non-aerosol	1	12/31/2010
Fabric Protectant		
Non-aerosol	1	12/31/2010

* Previously unregulated category

Proposed Categories, VOC Limits, and Effective Dates

Product Category	Proposed VOC Limit (wt%)	Effective Date
Fabric Care cont…		
Fabric Softener – Single Use Dryer Product*	0.05 grams per use	12/31/2010
Spot Remover Aerosol Non-aerosol	 15 3	 12/31/2010 12/31/2010
Lubricants/Penetrants		
Multi-purpose Lubricant	25 10	12/31/2013 12/31/2015
Penetrant	25	12/31/2013

* Previously unregulated category

Proposed Categories, VOC Limits, and Effective Dates

Product Category	Proposed VOC Limit (wt%)	Effective Date
Personal Care Products		
Astringent/Toner-- Non-FDA regulated	35	12/31/2010
Personal Fragrance Product (20% or less fragrance)**	75	12/31/2014
Sealant or Caulking Compound		
Chemically Curing non-aerosol	3	12/31/2012
Non-chemically Curing non-aerosol	1.5	12/31/2010
Waxes and Polishes		
Floor Maintenance Product*	1	12/31/2010
Floor Polish or Wax--Wood Floor Wax	70	12/31/2010

* Previously unregulated category
** Remove Grandfather Clauses

Proposed VOC Exemption: Hydrofluoroether (HFE) 7200

- Solvent used in precision (electronic) cleaning
- Environmental Impact Assessment report completed in March 2008
  - Negligibly reactive with respect to ground-level ozone formation
  - Low GWP
  - Replaces compounds with higher GWP and/or stratospheric ozone depleting compounds
  - No other adverse impacts identified

Proposed Prohibition on Use of Toxic Compounds

- Prohibit use of Perchloroethylene, Methylene Chloride, Trichloroethylene in:
  - Carpet/Upholstery Cleaner
  - Fabric Protectant
  - Multi-purpose Lubricant
  - Penetrant
  - Sealant or Caulking Compound
  - Spot Remover
- Reduction of about 0.20 tons per day in 2010

Greenhouse Gas Proposal

- GWP limit for Pressurized Gas Duster:
  - 150 CO_2e, effective 12/31/10
  - 1% VOC limit
- Prohibit Perchloroethylene & Methylene Chloride
- Reduces 0.2 MMT CO_2e per year

Other Regulatory Changes

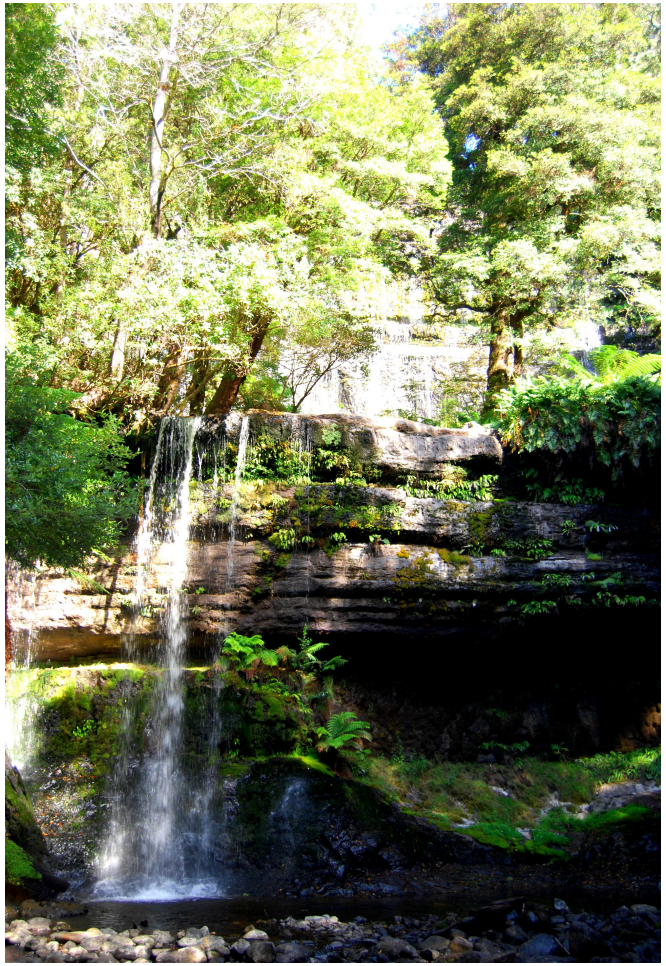
- Determining VOC content for diluted products sold in ready-to-use containers
- Restore exemption for Furniture Maintenance Product (solid/paste forms)
- Date coding
- Method 310 used to determine compliance with global warming potential limit
- Other necessary conforming modifications

Economic Impacts

- Cost-effectiveness
  - $6.23 per pound of VOC reduced
  - $0.22 per metric ton CO_2e reduced
- Average change in return on owner's equity is 2.5 percent

Environmental Impacts

- VOC reduction of 5.8 tons per day
  - Reduces ground-level ozone concentrations
- Greenhouse gas reduction of 0.2 MMT CO_2e per year
- Toxics prohibitions reduce exposure to carcinogens
- No significant adverse impacts



Proposed Modifications

- Definitions
  - Floor Maintenance Product
  - Not for Retail Sale
  - Personal Fragrance Product
  - Sealant or Caulking Compound
- Motor Vehicle Wash limit
  - Applies to non-aerosol products only
- Sealant or Caulking Compound labeling requirement

Issues

- VOC limits
  - Astringent/Toner (non-medicated)
  - Carpet/Upholstery Cleaner
  - Fabric Softener-Single Use Dryer Product
  - Motor Vehicle Wash limit should only apply to dilutable products
- Pressurized Gas Duster sell-through period
- Compliance timelines
- Proposal should include more categories

Ongoing Work

- Cleaning products
- Paint and lacquer thinners
- Nail coatings
- Spot removers for dry clean only fabrics
- Paint strippers
- Evaluate other categories for VOC and greenhouse gas reductions

Recommendation

- Adopt staff's proposed amendments with modifications described today