

PART II: Survey Introduction

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OVERVIEW

This section provides background about how the 2001 Consumer & Commercial Products Survey (survey) relates to the Consumer Products Program, and the purpose and goals for the survey.

Background

The information requested in this survey is made pursuant to Sections 39600, 39607, 39701, and 41511 of the California Health and Safety Code, and Sections 91100 and 94513, Title 17, of the California Code of Regulations (CCR). These sections authorize the California Air Resources Board (ARB) to *require* the submission of information needed by the Board to estimate atmospheric emissions and to carry out its other statutory duties. Associated laws and regulations may be found at the following website: www.arb.ca.gov/html/lawsregs.htm.

The Consumer Products Program is an important part of ARB's overall effort to reduce emissions from the use of consumer products in homes and institutions. Section 41712 of the California Health and Safety Code requires the ARB to adopt regulations that achieve the maximum feasible reduction in *volatile organic compound (VOC)* emissions from consumer products.



VOCs that are emitted from consumer products react with other pollutants in the presence of sunlight to form ground-level ozone and particulate matter, which are the main ingredients of smog.

The ARB developed California's State Implementation Plan (SIP) for ozone in 1994. The SIP serves as California's overall long-term plan for attainment of the federal ozone standards. In the SIP, VOC emissions from consumer products were estimated to be 265 tons per day in 1990. ARB committed to achieving significant reductions from consumer product emissions by 2010. To help achieve these reductions, VOC standards have been developed for 83 consumer product categories.

Regulation of consumer products has resulted in considerable reductions of emissions from consumer products during the last ten years. However, after the latest standards are implemented in 2005, emissions will begin to increase from consumer products due to population growth. Therefore, additional control measures are necessary so that this emissions growth will not overtake the reductions already achieved. As part of the regulatory process, the ARB must determine that adequate data exists to adopt regulations. This survey is a primary step in gathering the data. Additionally, Section 41712(c) of the California Health and Safety Code stipulates that no regulation shall be adopted which requires the elimination of a product form.

Purpose & Goals

This purpose of this survey is to gather current information on *volatile organic compound (VOC)* emissions from selected consumer and commercial product categories. The survey has two goals: first to update our consumer products emissions inventory, and second to assist us in determining the feasibility of further reducing consumer products emissions. Please note that all categories surveyed will not necessarily be regulated; only those where new VOC limits are determined to be commercially and technologically feasible.

***Purpose:* to gather current information on VOC emissions from selected product categories.**

SURVEY DEVELOPMENT

The following section provides information about how the survey was developed and describes how this survey differs from the last consumer and commercial product survey performed for 1997.

Workgroup Formed

The ARB sent over 3,000 invitation letters to potential consumer product stakeholders to help establish the 2001 Survey Stakeholder Workgroup (Workgroup), a subcommittee of the Consumer Products Workgroup. The Workgroup served as a forum for on-going communication between ARB and stakeholders regarding the development of the survey.

Close to 300 representatives from industry, environmental groups, concerned citizens, and government agencies chose to receive updates on this survey development process. Ultimately, over 90 stakeholders actively participated in the development of this survey.

Over 90 stakeholders helped ARB develop this survey.

Three Workgroup meetings were held which were open to the public and announced to the Workgroup as well as the consumer product list-server. The meetings averaged 50 participants, not including ARB staff. The meetings offered participation by teleconference or in-person and written comments were taken in the weeks following each meeting. The Workgroup meetings were held as follows:

- April 4, 2002 – This initial meeting introduced the ARB Consumer Products Program and the staff working on the survey, provided the proposed categories that would be surveyed, and presented the expected timeline for sending the survey and for taking potential regulations to the Board.
- May 30, 2002 – ARB released the first full draft of the survey about a week before the meeting. Based on comments from the previous meeting, changes were made to the survey categories and presented at this meeting. Stakeholders provided verbal comments.
- July 25, 2002 – In preparation for this final meeting, the second full draft of the survey was released with changes incorporated from comments received at the previous meeting. Stakeholders provided final verbal comments concerning the survey layout and survey categories.

We would like to thank the many participants from the Workgroup that worked together with us over the last several months to develop this survey. Special thanks to The Cosmetic, Toiletry, And Fragrance Association (CTFA), Consumer Specialty Products Association (CSPA), International Sanitary Supply Association, Inc. (ISSA), National Paint & Coatings Association (NPCA), The Chlorobenzene Producers Association (CPA), The American Beauty Association (ABA)/Nail Manufacturers' Council (NMC), and The Automotive Specialty Products Alliance (ASPA). We also want to thank the numerous individuals not specifically listed here that provided valuable insight and comments during the survey development process. The survey reflects those considerations and has been greatly improved as a result of input from the Workgroup.

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New Since the '97 Survey

This survey was developed using the ARB 1997 Consumer & Commercial Products Survey ('97 Survey) as a starting point. The following is a list of major differences that can be found in the current survey:

- **Speciation of LVP-VOC solvents** – This survey requires not only speciation of VOCs, but also *low vapor pressure volatile organic compound (LVP-VOC)* solvents. This change is necessary to enable staff to develop reactivity-based standards, if appropriate.
- **Product label submission requirement** – Respondents are required to submit one entire product *label* for every product or *product group* for this survey. Original *labels*, photocopies, scanned images, and *.pdf files are acceptable. For more details on submitting the *labels*, see FORM 3 instructions on page 29. Submission of product *labels* will enable staff to better characterize products into specific categories.
- **Completed survey due within 120 days** – Although the '97 Survey followed Section 94513(a) of the Consumer Products Regulation, which provides 90 days for response, this survey requires complete submission from both the *responsible party* and *formulator* to the ARB within 120 days. The additional 30 days for survey submission was afforded because more detailed information is required for this survey compared to the '97 Survey.
- **Gathering information for reactivity** – To help the ARB determine if a survey category has the potential to be regulated using reactivity based standards, this survey requires the Bin number, trade name and *manufacturer* for *hydrocarbon solvents*. See FORM 4 instructions on page 32 for details. Also, see page 17 for a website address to find out more information about reactivity.
- **NAICS code reporting** – Rather than using Standard Industrial Classification (SIC) codes, respondents will report industry classification using the 2002 North American Industry Classification System (NAICS) codes on this survey.
- **Expanded electronic version** – Compared with the '97 Survey, a more detailed and expanded interactive version of the survey has been developed that will allow respondents to complete *all* data forms electronically. See page 15 for details.
- **Updated survey format** – The forms are provided in a landscape orientation to easily distinguish them from the body of the survey. Additionally, for convenience when filling out the forms, detailed instructions can be found on the back of each form, with a numerical indexing system that is used to make finding specific instructions easier.