

Aerosol Coatings Background

The Aerosol Coating Products Regulation was originally adopted in March of 1995 and contained mass-based VOC limits for 35 categories of aerosol coatings. In 1998, ARB adopted revised mass-based limits with the commitment to evaluate the feasibility of reactivity limits. In 2001, ARB adopted the Regulation for Reducing the Ozone Formed from Aerosol Coating Products and proposed Tables of Maximum Incremental Reactivity (MIR) Values. The main component of the rulemaking was to establish reactivity limits for 36 coating categories based on the MIR scale. The reactivity limits became effective for 6 general coating categories on June 1, 2002, and on January 1, 2003, for the remaining 30 specialty coating categories. As approved in the State Implementation Plan for Ozone (SIP) the reactivity limits replaced the mass-based VOC content limits with equivalent reactivity-based limits.

Reactivity is the concept that different VOCs have varying potentials to react in the atmosphere to form ground level ozone. Rather than limiting the total mass of VOCs, the Aerosol Coating Products Regulation limits the reactivity of the VOCs used in aerosol coating products. To make the distinction that all VOCs, including compounds that in mass-based regulations are considered exempt, we use the term reactive organic compound (ROC). Using the term ROC in the regulation means that all VOCs – even previously exempt compounds such as acetone – must be considered in determining the overall reactivity of a product.

Purpose & Goals

The purpose of this survey is to gather current information on volatile organic compound (VOC), or in the case of Aerosol Coatings, reactive organic compound (ROC), and greenhouse gas (GHG) content from consumer and commercial product categories.

The survey has two goals: first to assist us in determining the feasibility of further reducing consumer products emissions and second to update our consumer products emissions inventory. Please note that all categories surveyed will not necessarily be regulated; regulation will occur only in cases where new VOC or Maximum Incremental Reactivity (MIR) limits are determined to be commercially and technologically feasible.

***Purpose:* to gather current information on VOC, ROC, & GHG content from consumer products.**

Designation of Confidential Information

State law protects the confidentiality of trade secrets (Title 17, CCR, Sections 91000-91022). The Confidential Information Form provides a summary of these regulations and the full citation of these sections is provided in Attachment A: Statute: Disclosure of Public Records. ARB has many years of experience in handling confidential information and takes its responsibilities very seriously. All confidential information will be kept in specifically designated, locked file cabinets and will only be accessible to authorized ARB staff on an "as needed" basis.

If you wish to designate information as confidential, fill out the Confidential Information Form and check the confidential box on each form as described. The confidential boxes, like the one shown below, are located in the upper right-hand corner of all forms. All information that is designated as confidential will be handled in strict accordance with ARB confidentiality regulations and policies.

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Confidential

<http://www.arb.ca.gov/consprod/regact/2006surv/2006surv.htm>, 916-322-7072, csmrprod@arb.ca.gov