



Public Workshop

Proposed Amendments to the Consumer Products Regulation

July 29, 2010



California Environmental Protection Agency

Air Resources Board

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Overview

- Background
- Proposed Amendments
 - New and modified definitions
 - VOC limit proposals
 - Other regulatory proposals
 - Method 310 changes
 - Ongoing evaluations
- Ongoing Work
- Timeline

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Background

- California Clean Air Act requires ARB to regulate consumer products
 - Achieve the maximum feasible reduction in volatile organic compounds from consumer products
 - Regulations must be technologically and commercially feasible
 - Must not eliminate a product form
- Assembly Bill 32 calls for reductions in greenhouse gases

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State Implementation Plan (SIP or State Strategy)

- 2007 SIP commitment for consumer products is a 30-40 tpd VOC reduction

Consumer Products Rulemaking	VOC Reductions (tons per day)
June 2008 Amendments	4.5
September 2009 Amendments	14.7
2010 Amendments	5 – 8
Additional Reductions from 2006 Survey Product Categories	5.8 – 12.8
Totals Reductions before January 1, 2014	30 – 40

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Proposed Amendments to the Consumer Products Regulation

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Technological Basis

- 2006 Consumer Products Survey
 - Data grown to 2010
 - Adjusted for market coverage
 - Reductions grown to effective date
- 2009 Survey for Spot Removers used at dry cleaning operations

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Proposed Amendments

- New and Modified Definitions
- Volatile Organic Compound (VOC) Limits
- Other Regulatory Proposals
 - Prohibitions on use of chlorinated toxic solvents in 4 categories
 - Preclude use of compounds with global warming potential values above 150 in 6 categories
 - Consolidate toxic compound restrictions and global warming potential limits into tables
 - Most Restrictive Limit modifications
 - Method 310 amendments

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Proposed New or Modified Definitions

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Proposed New and Modified Definitions

- Automotive Wax/Polish/Sealant/Glaze
- Dry Cleaning Fluid
- Existing Product
- General Purpose Cleaner
- General Purpose Degreaser
- Laundry Prewash
- Lawn and Garden Insecticide
- Lubricant
- Metal Polish/Cleanser
- Multi-Purpose Solvent
- Oven or Grill Cleaner
- Sealant or Caulking Compound
- Silicone-based Multi-purpose Lubricant
- Special Purpose Lubricant*
- Spot Remover
- Wasp and Hornet Insecticide

* New Definition

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Proposed Definitions: Further Discussion

- Automotive Wax, Polish, Sealant or Glaze
 - Reorganized to clarify subcategories of category
- Dry Cleaning Fluid
 - Limited to solvent used in dry cleaning machines
- Lubricant
 - Proposing to clarify industrial use products
- Multi-purpose Solvent
 - Exclude “single purpose cleaners”
- Oven Cleaner
 - Modified to include grill cleaning products

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Proposed Definitions: Further Discussion (cont.)

- **Special Purpose Lubricant**
 - Proposed category would include all lubricants that are not Multi-purpose Lubricants
 - Exclude rust preventive products not making lubricant claims
- **Spot Remover**
 - Modified to include spotters used at dry cleaning operations

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Volatile Organic Compound Limit Proposals

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Modifications to VOC Limit Proposals

- Glass Cleaner
- Wasp or Hornet Insecticide
- Furniture Maintenance Product
- Metal Polish or Cleanser
- Silicone-based Multi-purpose Lubricant

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Proposed Categories and VOC Limits

Product Category	Proposed VOC Limit (wt%)	Effective Date	VOC Reduction (tpd)
Cleaners and Degreasers			
General Purpose Cleaner: non-aerosol	0.5	12/31/12	3.73
General Purpose Degreaser: non-aerosol	0.5	12/31/12	0.45
Glass Cleaner: non-aerosol	3.0	12/31/12	0.41
Oven or Grill Cleaner:			
aerosol	8	1/1/93	< 0.01
non-aerosol	4	Effective date	-0.12
Laundry Care			
Spot Remover (Dry Clean Only):			
aerosol	15	12/31/12	< 0.01
non-aerosol	3	12/31/12	0.17

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Proposed Categories and VOC Limits (cont.)

Product Category	Proposed VOC Limit (wt%)	Effective Date	VOC Reduction (tpd)
Lubricants			
Special Purpose Lubricant:			
aerosol	25	12/31/12	0.14
non-aerosol	3	12/31/12	0.14
Personal Care Products			
Heavy-duty Hand Cleaner or Soap	1	12/31/12	0.52
Pesticides			
Flying Bug Insecticide: aerosol	15	12/31/12	0.18
Wasp or Hornet Insecticide	10	12/31/12	0.14

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Proposed Categories and VOC Limits (cont.)

Product Category	Proposed VOC Limit (wt%)	Effective Date	VOC Reduction (tpd)
Vehicle & Marine Vessel Aftermarket Products			
Automotive Rubbing or Polishing Compound: non-aerosol	3	12/31/12	0.22
Automotive Wax/Polish/Sealant/Glaze	3	12/31/12	0.23
Waxes & Polishes			
Furniture Maintenance Product: aerosol	12	12/31/13	0.36
Metal Polish or Cleanser:			
aerosol	15	12/31/12	0.07
non-aerosol	3	12/31/12	0.17

- Total VOC Reduction is 6.8 tpd

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Other Regulatory Proposals

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Other Regulatory Proposals

- Prohibit use of methylene chloride, perchloroethylene, and trichloroethylene in:
 - Spot Remover (for Dry Clean Only)
 - Silicone-based Multi-purpose Lubricant
 - Special-purpose Lubricant
 - Metal Polish or Cleanser

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Other Regulatory Proposals (cont.)

- Preclude use of compounds with global warming potential values above 150 in:
 - Flying Bug Insecticide
 - Furniture Maintenance Product
 - Metal Polish or Cleanser
 - Spot Remover
 - Special-purpose Lubricant
 - Wasp or Hornet Insecticide
- Based on Second Assessment Report

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Other Regulatory Proposals (cont.)

- Consolidate toxics provisions
 - Section 94509(m)
 - Table (m)(1) contains chlorinated solvent restrictions
 - Note inclusion of automotive maintenance products subject to the Airborne Toxic Control Measure
 - Table (m)(2) contains PDCB restrictions
- Consolidate global warming potential limits
 - Section 94509(n)

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Other Regulatory Proposals (cont.)

- Most Restrictive Limit provision (section 94512(a))
 - Delete existing subpart 3
 - Add subpart to clarify applicability when 2 categories exclude each other

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Proposed Amendments to ARB Test Method 310

- Add procedures for determining VOC content of Fabric Softener – Single Use Dryer Product
- Add procedures for determining aromatic compound content of Paint Thinner and Multi-purpose Solvent

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Proposed Amendments to ARB Test Method 310 (cont.)

- Section 4.2.3. Fabric Softener-Single Use Dryer Product:

Grams of VOC per sheet shall be calculated as follows:

$$\text{Total Grams VOC/Sheet} = \frac{S - R}{S} * D$$

Where: S = mass, in grams, of the dryer sheet sample;

R = mass, in grams, of sample residue by gravimetric analysis;

D = mass, in grams, of the single dryer sheet

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Proposed Amendments to ARB Test Method 310 (cont.)

- Section 3.3.8. Aromatic compound content to be determined by one or more of the following methods:
 - U.S. EPA Method 602/8020
 - U.S. EPA Modified Method 8015
 - U.S. EPA Method 625/8270
 - ASTM D 5443-04
 - ASTM D 3257
 - ASTM D 3710-95
 - ASTM D 3606-06
 - ASTM D 5580-02

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Ongoing Evaluations

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Ongoing Evaluations

- Consumer Products Labeling
 - Goals include:
 - Enhance the enforceability of the regulation
 - Increase compliance with VOC Limits
 - Provide consumers and retailers with more information
 - Target categories having high non-compliance (e.g. enforcement history, magnitude of emissions, etc.)

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Ongoing Evaluations (cont.)

Consumer Products Labeling (cont.)

- Draft conceptual language for discussion in section 94512(f)
 - Would apply to responsible party and manufacturer
 - “CA VOC Compliant” along with specified product category
 - Provisions for Alternative Control Plan products and Innovative Products
 - Be readily observable

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Ongoing Evaluations (cont.)

- Alkylphenol Ethoxylates
 - Evaluating use of alkylphenol ethoxylates to determine if mitigation measures are necessary
 - Consultation with Water Board

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Ongoing Evaluations (cont.)

- LVP-VOC Glycol Ethers Assessment
 - Evaluating potential adverse exposures if LVP-VOC glycol ethers used in cleaning products
 - Conduct exposure assessment
 - Compare exposures to RELs
 - Evaluate need for mitigation

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Ongoing Work

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Enforcement Advisories

- Clarify 'minimum recommended dilution' and 'incidental use' in section 94509(b)
- Clarify differences between 'general purpose' and 'special purpose'

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Update on 2009 Amendments

- Second 15-day notice comment period ended on July 13
- Clarify exemption for Industrial Maintenance Coatings thinners
- Final statement of reasons complete in early August

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Timeline

- Requesting written comments: August 16
- Third public workshop: late summer (if needed)
- Release staff report: September 29, 2010
- Board hearing in Sacramento:
November 18-19, 2010

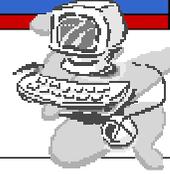
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Websites



- Air Resources Board website: <http://www.arb.ca.gov>
- Consumer Products website:
<http://www.arb.ca.gov/consprod/consprod.htm>
- Consumer Products Regulations website:
<http://www.arb.ca.gov/consprod/regs/regs.htm>
- Consumer Products List Server website:
<http://www.arb.ca.gov/listserv/listserv.php>
- 2010 Consumer Products Regulation Amendments website:
<http://www.arb.ca.gov/consprod/regact/2010ra/2010ra.htm>
- 2006 Survey website:
<http://www.arb.ca.gov/consprod/regact/2006surv/2006surv.htm>
- Climate Change Program website: <http://www.arb.ca.gov/cc/cc.htm>

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