August 6, 1997

Dear Sir or Madam:

Enclosed is a summary of the Consumer Products Working Group (CPWG) meeting which was held on May 20, 1997, in Sacramento, California. We have also enclosed a copy of the attendance list for the meeting.

This was the fifth semi-annual meeting of the CPWG. Staff from the Air Resources Board (ARB) and the Department of Pesticide Regulation (DPR) presented updates on the ongoing activities of the consumer products program. Attendees included representatives from ARB, DPR, industry, trade associations, and the United States Environmental Protection Agency.

If you have any questions about the CPWG meeting, please call Ms. Doris Rausch, Implementation Section, at (916) 327-1529.

Sincerely,

Genevieve A. Shiroma, Chief
Air Quality Measures Branch

Enclosures

cc: Ms. Doris Rausch (w/Enclosures)
Implementation Section
Stationary Source Division

Consumer Products Working Group
Fifth Meeting Summary - May 1997

Introduction

The fifth semi-annual meeting of the Consumer Products Working Group (CPWG) was held on May 20, 1997, at the Sacramento Convention Center in Sacramento, California. The following items were presented at the meeting:

Update on Consumer Products Related Activities:

1. Status of State Implementation Plan

2. Update on the Pesticide Element of the State Implementation Plan

3. Research Contracts

4. Reactivity Subgroup

5. Low Vapor Pressure Method Development Status

Summary

Ms. Lynn Terry, Assistant Executive Officer of the Air Resources Board, held a question and answer session on the status of the State Implementation Plan (SIP) as a follow-up to the presentation given by Ms. Cynthia Marvin of the Office of Air Quality Planning and Transportation at the Mid-term Measures workshop on April 15, 1997. The questions and answers were as follows:

Question: Is there a specific time line for revision of the SIP?
Answer: There is no federal requirement for the State to update the current SIP on a regular basis. However, the State does monitor SIP progress on an ongoing basis to determine when an update is appropriate. The ARB expects to initiate the next planning cycle in the year 1999, as we anticipate that a new plan to meet the recently proposed federal ozone and particulate matter standards will be due in 2002/2003.

Question: How can members of the consumer products industry play a positive role in ensuring the integrity of data used when developing the emissions inventory and the SIP?
Answer: The consumer products industry is doing well by continuing to actively work with the Stationary Source Division during the rule development process. Attendees may be interested in following the public process established by SB 2174 (Polanco, 1996), which requires the Board to approve ARB's emission inventory triennially. In fact, ARB's emission inventory methodologies and results will be presented to the Board this Fall. The updated inventory will include many improvements, including more refined surrogates for inventory growth.

Question: Will reactivity be a component of California's plan?
Answer: Reactivity will continue to be a part of

the SIP measures.

Question: Is there a working group for SIP development?
Answer: No, although there will be a public process at both the State and local level for the next revision. Since SIP development begins with the individual districts in California, it would be appropriate to work with them.

Staff from the Department of Pesticide Regulation (DPR) gave a presentation on the pesticide volatile organic compound (VOC) plan. Staff is implementing a plan to reduce pesticidal sources of VOCs, which are precursors to ozone formation. The goal of the plan is to reduce agricultural and commercial structural sources of VOCs by 20 percent between 1990 and 2005 in air districts in federal nonattainment areas that reference the DPR plan.

Since that plan was approved by the United States Environmental Protection Agency, DPR has developed the thermogravimetric (TGA) analytical method for estimating the VOC emission potential (EP) of pesticides; requested that pesticide registrants develop EP data using that method; assigned an EP value for each registered agricultural and commercial structural use pesticide based on the TGA method, a water subtraction method, or a default method; distributed a list of those EP values; used the EP data along with pesticide use data to calculate total pesticide VOC emission data for 1990-1995, and analyzed these data to determine the major sources of pesticidal VOCs and the progress in meeting the reduction goal in the five areas that are in nonattainment for the federal ozone standard.

The next step is to identify options for adopting an enforceable program should existing efforts to reduce VOCs fail to meet the reduction goal. A series of workshops will be held around the state to disseminate the VOC data and analysis, and to seek options for adopting an enforceable program for reducing pesticidal VOCs, if necessary.

Staff from the Research Division gave an update on research contracts for consumer products. A synopsis of the research update follows:

- Improvement of Speciation Profiles for Aerosol Paints and Coatings: Task 1 report was sent to the Aerosol Coatings Committee, and comments were incorporated into the final scope of work. Analysis of aerosol paint samples has begun and should be

completed later this year. A draft final report should be sent to the Aerosol Coatings Committee by the end of the year.

- Uncertainty Analyses of Chemical Mechanisms Derived from Environmental Chamber Data: Contract is on track. Choosing of appropriate chamber experiments to use to determine uncertainties in their results is proceeding.

- Investigation of Atmospheric Reactivities of Selected Stationary Source VOCs: First round of compounds used in chamber experiments are complete. Second round compounds have been determined and chamber experiments will begin soon.

  On a related note, Bill Carter, the Principal Investigator, has also developed (not through this contract) a methodology for determining default values for a compound reactivity and has proposed to validate the methodology against compounds of known reactivity. If this methodology proves valid, it will certainly assist in any reactivity based regulation.

ARB staff reported on the Reactivity Subgroup's progress to date on the development of the consumer products low emissions and reactivity (CLEAR) program. Two regulatory concepts have been proposed to date: CLEAR 1 (reactivity-based only) and CLEAR 2 (hybrid reactivity/mass-based). Staff presented the two different concepts, then compared them.

The Monitoring and Laboratory Division staff provided an update on the low vapor pressure (LVP) method development status. Staff is looking at several analytical methods for determining LVP-VOC. This analysis is based on the definition of LVP-VOC as a compound having a vapor pressure of less than 0.1 mmHg at 20øC or greater than 12 carbons. MLD is considering analysis based on a boiling point of greater than 216øC. The methods being considered are the isoteniscope, the 2887 hydrocarbon analysis, thermal analysis (DSC), and the automated D86. A round-robin analysis of various solvents will be done in the fall with Exxon and Phoenix Lab currently. This will include analysis of the solvent on the 2887. Comments and input from industry is encouraged as to the experience they have had with the various methods.

Future Meetings

The Air Resources Board will hold a public hearing

to consider the approval of the Mid-term Measures revisions to the consumer products regulation on July 24 and 25, 1997.

The next meeting of the CPWG is tentatively scheduled for October, 1997.

Inquiries about this meeting summary should be directed to Doris Rausch, Air Resources Board, at (916) 327-1529.