

**California Air Resources Board – Consumer Products Program  
6/01/2006**

**Additional Items to Consider for  
2006 Consumer Products Regulation Amendments**

**1. Multi-function Products (MFP) Analysis**

- Multi-function Products make claims to remove multiple contaminants such as: Chewing gum; candle wax; stickers; decals; latex paint drips; adhesives; bumper stickers; tape; glue; crayon; markers; ink; oil; grease; grime; goo; spots; carpet stains; lipstick; shoe polish; graffiti; scuff marks; soap residue; asphalt; flux; nail polish; bugs; tar; and many more
- By policy and product determination letters, such products have been considered “Multi-Purpose Solvents” (MPS) and have not been subject to the Most Restrictive Limit Provision, (no VOC limit for MPS)
- Commitment made in last rulemaking –
  - determine appropriate regulatory strategy for products that make multiple removal claims (compare product labels with currently regulated categories)
  - re-evaluate technical feasibility of General Purpose Adhesive Removers and Graffiti Removers limits adopted in 2004 rulemaking (feasibility was reconfirmed)
  - address conflict with Most Restrictive Limit provision
  - consider redefining Multi-purpose Solvents and regulate as a separate category
- Staff proposes that these products comply with Most Restrictive Limit – will set a timeframe for compliance
- Each removal claim can be found on a competing, complying product in market place
- Necessary to preserve reductions claimed in previous rulemakings – may be able to quantify additional reductions
- Will require that some MFP products be reformulated and/or re-labeled

**2. VOC Exemptions**

- TBAC (tertiary-Butyl acetate)
  - May be incorporated into amendments
  - Staff will evaluate on a category by category basis to determine if an increased use of tbac could cause unacceptable exposures, and may consider limiting it's use
- HFC-43-10 mee, HCFC-225 ca and cb, HFC-245 fa, HFE-7100 & HFE-7200
  - Clarifications and data submittal ongoing, may be difficult to incorporate in to amendments in the timeframe allowed

**3. Nail Polish Removers**

- Currently has a 0% VOC limit
- Will propose 1% VOC limit to address methanol (VOC) impurity and a VOC-creating hydrolysis reaction that occurs over time from the use of methyl acetate (VOC-exempted & ARB suggested to meet 0% VOC limit)
- Emission shortfall minimal

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### 4. **Overlap between Consumer Products and Aerosol Coatings Regulations**

- Add language to address this situation. Ex. Rubber & Vinyl Protectant is subject to both Aerosol Coatings Regulation and Consumer Products Regulation
- Change Aerosol Coatings Definition in the Aerosol Coating Rule
- Most Restrictive Limit provision between regulations?
- No specific proposal at this time

### 5. **Rubber and Vinyl Protectant Analysis**

- Drafting error in current regulation, should have been “Rubber **OR** Vinyl Protectant,” per staff report
- May overlap with aerosol coatings regulation
- Made request to obtain formulation and sales info for aerosol products
- Staff will perform technical assessment of aerosol VOC limit

### 6. **Re-evaluate Percent Level of Fragrance Exemption**

- 2% may be too high for many categories, such as fabric softeners, cleaners etc.

### 7. **Ban Toxic compounds in specific categories where appropriate**

- N-Hexane in Adhesives
- Methylene Chloride in Brush Cleaners
- Perchloroethylene in Tire Sealers/ Inflators
- Other categories?

## **Administrative Changes**

### 8. **Consider Requiring IPE Products to Include Executive Order # on Label**

- Necessary to keep track of IPE products

### 9. **Add a Definition for “Manufacture for Sale in California”**

- Enforcement Issue
- Would make clear that only complying products can be sold at retail in California where supplied through a distributor or series of distributors

### 10. **Reference the Automotive ATCM**

- This would remind industry that prohibitions on the use of Methylene Chloride, Perc, and Trichloroethylene are in effect for Brake Cleaners, Engine Degreaser, General Purpose Degreaser, and Carb & Choke Cleaners

### 11. **Modify Existing Product definition**

- To put a baseline in place for 2004 categories and those we adopt this year. (see 95408 (a) (50) “Existing Product”)

### 12. **Other Administrative Changes**

- Staff may propose other minor administrative changes that would serve to clarify regulation, or correct errors, but would not create new requirements