



Air Resources Board



Matthew Rodriguez
Secretary for
Environmental Protection

Mary D. Nichols, Chairman
1001 I Street • P.O. Box 2815
Sacramento, California 95812 • www.arb.ca.gov

Edmund G. Brown Jr.
Governor

July 10, 2012

Dear Sir or Madam:

I am writing to notify you that section 94513(g) of the Consumer Products Regulation requires Responsible Parties for Multi-purpose Solvent and Paint Thinner products to submit specific data for products sold, supplied, offered for sale, or manufactured for sale in California. The data are necessary as part of Air Resources Board (ARB) staff's assessment on the feasibility of the three percent by weight volatile organic compound (VOC) limits scheduled to become effective on December 31, 2013.

Responsible Parties or formulators for Multi-purpose Solvent and Paint Thinner products must report the following information:

- Data regarding product sales and composition for the year 2011, including the information listed in section 94513(a), and the entire product label; and
- A written update of the research and development efforts undertaken to achieve the three percent VOC limits specified in section 94509(a). The written update must include detailed information about the raw materials evaluated for use; maximum incremental reactivity (MIR) values for any VOC or Low Vapor Pressure – Volatile Organic Compound (LVP-VOC) used or evaluated; the function of the raw material evaluated; the testing protocols used; the results of the testing; and the cost of reformulation efforts.

To help us fully evaluate the feasibility of the 3 percent VOC limits, you should report the same data for products that are labeled as acetone, denatured alcohol, linseed oil, methyl ethyl ketone (MEK), mineral spirits, naphtha, odorless mineral spirits, or turpentine as the product name or part of the product name. You should also report data on any products that meet the definition of multi-purpose solvents and/or paint thinners except they are sold in a form other than liquid (for example, aerosol). Also report products designed for paint clean-up and/or surface preparation.

Enclosed, for your convenience, are forms and instructions for you to use to submit your data. As always, all information that you designate as confidential will be handled strictly according to ARB confidentiality regulations. Please read and complete the enclosed Confidential Information Form and return it with your reporting forms. A space

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.

California Environmental Protection Agency

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is provided on each reporting form for you to clearly designate your submittal as confidential. The forms should be completed and returned to ARB by September 17, 2012.

You may be aware that we are considering future amendments that would change how VOC content is determined for these categories. One approach would be to 'count' LVP-VOC content when determining compliance with the limits. Other potential amendments would clarify the types of paint thinning products that are not subject to the VOC limits (e.g. Industrial Maintenance Coating Thinners). We will also use these data to evaluate whether the definitions for multi-purpose solvent and paint thinner should include all product forms (not just liquid). The goal of these amendments would be to ensure that predicted emission reductions from adoption of Rule 1143: Consumer Paint Thinners and Multi-Purpose Solvents in the South Coast Air Quality Management District and the State's regulation are achieved. In completing these forms you may want to consider these potential changes and the impacts on your research and development efforts.

Thank you in advance for providing us with the information on your progress toward complying with the three percent VOC limits. The complete text of the Consumer Products Regulation can be found at:
<http://www.arb.ca.gov/consprod/regs/gencregs.htm>. For information on upcoming activities relating to consumer products, please sign up for the consumer products list serve at http://www.arb.ca.gov/listserv/listserv_ind.php?listname=consprod.

If you have any questions regarding this matter, please contact Mr. Minh Pham at (916) 324-0226.

Sincerely,

Carla D. Takemoto, Chief
Area Source and Emission Inventory Programs Branch
Planning and Technical Support Division

Enclosures

cc: Mr. Minh Pham
Air Pollution Specialist
Technical Development Section
Planning and Technical Support Division

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bcc: (With Enclosures)

Linda Murchison, PTSD
Kurt Karperos, PTSD
Jose Gomez, PTSD
Judy Yee, PTSD

PTSD Chron
ASEIPB Chron

Assignment #8504

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