



Linda S. Adams  
Secretary for  
Environmental Protection

# Air Resources Board

---

Robert F. Sawyer, Ph.D., Chair  
1001 I Street • P.O. Box 2815  
Sacramento, California 95812 • [www.arb.ca.gov](http://www.arb.ca.gov)



Arnold Schwarzenegger  
Governor

September 19, 2006

Dear Sir or Madam:

I am writing to remind you that certain Air Resources Board (ARB or Board) standards and related requirements for consumer product categories will become effective on December 31, 2006. The specific regulatory requirements are contained in the California Consumer Products Regulation, codified in sections 94507–94517 of Title 17 of the California Code of Regulations. The standards for these consumer products specify the maximum content of volatile organic compounds (VOC) in the products, by weight percent. For your convenience, the affected consumer products categories and associated standards are listed in the enclosed Table I. In addition, requirements have changed for date coding, most restrictive limit, and certain toxic compounds. Effective dates vary depending on the requirement.

To facilitate the transition period when a regulatory “effective date” takes effect, the Consumer Products Regulation contains a “sell-through” provision. This provision typically allows the sale or supply of consumer products for three years if they were manufactured prior to the effective date of the applicable standard. However, to qualify for this sell-through, the products must be marked with the date of manufacture or an appropriate code-date that has been filed with ARB. This date or code-date must be displayed on containers beginning at least 12 months prior to the effective date of the standard.

Products manufactured after January 1, 2006, are subject to changes in date coding which require that companies use either the date of manufacture, a specified code, or annually provide ARB with an explanation of the code designating the date of manufacture. Initial date code explanations were due in January 2006 and are due each succeeding January unless a specified code or manufacture date is used. In addition, any time a company changes a date code it is required to file a revised code explanation with ARB prior to the product being sold in California with the revised code. All date codes are to be displayed so as to be observable without removing or disassembling any portion of the product container or packaging. An Advisory addressing changes to the consumer product date coding requirements is available at <http://www.arb.ca.gov/enf/advs/advs345.pdf>.

*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

---

Sir or Madam  
September 19, 2006  
Page 2

Currently, products which are multi-function are subject to the most restrictive VOC limit as it applies to representations manufacturers make on the principal display panel of the product. As of January 1, 2007, manufacturer representations made anywhere on the label, packaging, and all affixed labels or stickers will be used to determine the applicable VOC limit for that product.

Para-dichlorobenzene, a California Toxic Air Contaminant (TAC), has been used in toilet/urinal care products and solid air fresheners. Because alternative non-para-dichlorobenzene products were widely available at the time of the adopted Air Toxics Control Measure, the effective date of the prohibition was December 31, 2005, with an expedited phase out and sell-through period allowed through December 31, 2006. The prior exemption for "air fresheners containing at least 98 percent para-dichlorobenzene" in section 94510(g) of the Consumer Products Regulation is provided through December 30, 2006, to enable the sell-through of the currently formulated products. Thereafter, the exemption expires and the para-dichlorobenzene prohibition becomes fully effective for all toilet/urinal care and air freshener products on December 31, 2006.

In addition, three TACs—methylene chloride, perchloroethylene, and trichloroethylene—are prohibited in seven product categories. Note that effective dates vary depending on the product category. The manufacturer of Contact Adhesives, Electronic Cleaners, Footwear or Leather Care Products, and General Purpose Degreasers with the above three TACs is prohibited effective December 31, 2005, with the sell-through period allowed through December 31, 2008. The manufacturer of Adhesive Removers, Electrical Cleaners, and Graffiti Removers with the above three TACs is prohibited effective December 31, 2006, with the sell-through period allowed through December 31, 2009.

Please be aware that notification requirements may be applicable to products sold or supplied after certain dates. An Advisory addressing the prohibition and notification requirements for consumer products containing of para-dichlorobenzene, methylene chloride, perchloroethylene, or trichloroethylene is available at <http://www.arb.ca.gov/enf/advs/advs341.pdf>.

When the Midterm Measures I and II amendments to the Consumer Products Regulation were adopted, the Board directed the Executive Officer to monitor the progress of manufacturers in meeting the VOC limits and to conduct technical assessments prior to the effective dates for each of the VOC limits. Pursuant to this directive, the ARB would like to learn about the progress your company is making to comply with the upcoming VOC standards. If your company anticipates it will successfully reformulate prior to the limits becoming effective, you do not need to

Sir or Madam  
September 19, 2006  
Page 3

contact us. However, if your company is experiencing difficulty with reformulating by the applicable effective date, we are asking you to contact us in writing. Your written comments should provide sufficient detail for us to determine the nature and extent of the problem, as well as the level of effort undertaken by your company to comply.

The Consumer Products Regulation, in its entirety, is available on the internet at <http://www.arb.ca.gov/consprod/regs/cp.pdf>. Alternatively, you may obtain paper copies of the regulation and advisories by contacting Mr. Jose Saldana of the Air Quality Measures Branch at (916) 322-0289 or [jsaldana@arb.ca.gov](mailto:jsaldana@arb.ca.gov). In the regulation, you will find definitions of the product categories and subcategories, the Table of Standards, the "sell-through" provision, and other regulatory requirements.

By California law, your products must meet applicable VOC limits in order to be sold in this State. I encourage you to refer to the regulation to determine whether any of the standards apply, now or in the future, to consumer products for which you are responsible. Thank you for your cooperation. If you have any questions about the standards or other aspects of the regulation, please contact Ms. Katherine Akins of my staff at (916) 445-4379 or [kakins@arb.ca.gov](mailto:kakins@arb.ca.gov).

Sincerely,

**/S/**

Janette Brooks, Chief  
Air Quality Measures Branch  
Stationary Source Division

Enclosures

cc: Mr. Bruce Moore  
Coatings & Consumer Products Group  
U.S. Environmental Protection Agency (MD-13)  
Research Triangle Park, North Carolina 27711

Ms. Katherine Akins  
Implementation Section  
Air Quality Measures Branch

Mr. Jose Saldana  
Air Quality Measures Branch

**Table 1: Consumer Product Standards  
Effective 12/31/06**

<b>Product Category</b>	<b>VOC Standard<sup>1</sup></b>
Adhesive Removers	
Floor or Wall Covering Adhesive Remover	5%
Gasket or Thread Locking Adhesive Remover	50%
General Purpose Adhesive Remover	20%
Specialty Adhesive Remover	70%
Adhesives	
contact adhesives - general purpose	55%
contact adhesives - special purpose	80%
Anti-static Product:	
non-aerosol	11%
Electrical Cleaner	45%
Electronic Cleaner	75%
Fabric Refresher:	
Aerosol	15%
non-aerosol	6%
Footware or Leather Care Product	
Aerosol	75%
solid	55%
all other forms	15%
Graffiti Remover:	
Aerosol	50%
non-aerosol	30%
Hair Styling Product	
Aerosol and pump sprays	6%
all other forms	2%
Shaving Gel	7%
Toilet/Urinal Care Product	
Aerosol	10%
non-aerosol <sup>2</sup>	3%
Wood Cleaner:	
Aerosol	17%
non-aerosol	4%

<sup>1</sup> Percent Volatile Organic Compound by Weight

<sup>2</sup> The manufacture of Solid Air Fresheners and Toilet/Urinal Care Products that contain para-dichlorobenzene was banned effective December 31, 2005. These types of products are subject to a one-year sell-through period which ends December 31, 2006.