



# South Coast Air Quality Management District

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Barry Wallerstein  
08-6-5

June 20, 2008

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Mary D. Nichols, Chairman  
California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

## Reference: **Agenda No. 08-6-5 -- Proposed Amendments to the California Consumer Products Regulation**

Dear Chairman Nichols:

The South Coast Air Quality Management District (AQMD) supports the proposed amendments to the California Consumer Products Regulation, scheduled for your June 26<sup>th</sup> meeting. However, AQMD also believes that the current proposal can be significantly strengthened and emission reductions further accelerated. With your assistance, the AQMD and CARB staff have worked closely on the recently-adopted revision to the Air Quality Management Plan (AQMP), which calls for significant reductions in VOC emissions in order for the AQMD to meet the federal 8-hour ozone standard. The AQMP also highlights the growing impact of VOC emissions from consumer products, which is the largest single source of VOC emissions in the South Coast Air Basin.

We urge your Board to substantially accelerate your emission reduction programs to achieve healthful air for the 16 million residents of the South Coast Air Quality Management District. In particular, we recommend that your Board direct staff to further consider future reductions from General Purpose Cleaners, General Purpose Degreasers, Glass Cleaners (including industrial and institutional (I&I) products) with a VOC limit of one percent by weight, and Multi-Purpose Solvent and Paint and Lacquer Thinners with a VOC limit of three percent by weight, as included in your original proposal for the current rule amendment. We request that these categories be included in CARB's proposed statewide regulation amendment scheduled for November 2008 and request that the Board so direct the staff with the attached resolution language.

Establishing a three percent by weight VOC limit for Multi-Purpose Solvent and the Paint and Lacquer Thinner categories, as included in your original proposal for the current rule amendments, would reduce 13.85 tons per day



of VOC emissions statewide (6.0 tons per day in South Coast). We understand that your staff delayed this item to a future rulemaking as a result of comments received from National Paint & Coatings Association. However, the AQMD has extensive experience with ultra-low VOC alternatives in these use categories. The success of AQMD's Rule 1171 – Solvent Cleaning Operations limit of 25 g/l over the last three years in a wide range of coating activities clearly demonstrates the feasibility of ultra-low VOC coating clean-up solvents. For thinning applications, AQMD conducted a survey of coatings available for purchase at retail outlets such as paint and hardware stores, and found that only one percent of the products recommended thinning with a product higher than three percent by weight. These products were highly specialized industrial maintenance coatings not normally associated with retail purchase.

We believe that there are a sufficient number of cost-competitive General Purpose Cleaners, General Purpose Degreasers and Glass Cleaners on the market to adequately meet a VOC limit of one percent by weight. Last April the AQMD developed and implemented the Clean Air Choices Cleaner Certification Program. In establishing a 10 g/l (one percent by weight) VOC content standard for the program, AQMD tested 21 "environmentally preferable" Industrial and Institutional (I&I) cleaning products from six different manufacturers. Of the 21 products tested, 12 were General Purpose Cleaners, General Purpose Degreasers and/or Glass Cleaners, and all met the 10 g/l VOC content standard. Green Seal, a major third party environmental certification organization, is in the final stages of adopting a one percent VOC limit for these same products. Clearly these products are "commercially and technologically feasible" and meet the necessary finding of Health and Safety Code 41712, which also calls for these regulations to achieve the maximum feasible VOC reductions.

We strongly support any and all appropriate actions that will allow the State Implementation Plan (SIP) commitments to be met and will assist in efforts to achieve clean air for the residents of California. We look forward to working closely with CARB towards attaining our mutual goals of reaching attainment of State and Federal air quality standards and further protecting the health of all Californians.

Sincerely,



Dr. William A. Burke,  
Chairman of the Board

Attachment

cc: James Goldstene  
CARB Members  
SCAQMD Board Members



2008 Consumer Products Regulatory Amendments  
Proposed Additional Resolutions

WHEREAS the SCAQMD has recommended VOC limits of three percent for Multi-Purpose Solvent, Paint and Lacquer Thinners, and one percent for General Purpose Cleaners, General Purpose Degreaser and Glass Cleaners, including I&I cleaners, and requested expedited Board consideration for adoption.

THEREFORE, BE IT RESOLVED, that CARB staff is directed to bring forth proposed language for Board consideration at the November 2008 meeting for a three percent limit for Multi-Purpose Solvent, Paint and Lacquer Thinners, and one percent for General Purpose Cleaners, General Purpose Degreaser, and Glass Cleaners, including I&I cleaners. The staff report should include an analysis of the feasibility and cost-effectiveness of such limits.