

RAYMOND REGULATORY RESOURCES
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CARB



Last month I reported that CARB had finally released their proposal for regulation for November of this year. It is extremely important that we make substantial comments on this regulation. I have received comments from some of you but what I would like to request is if you have not responded to the last 3R Review that you let me know which categories are of interest to you. Some of the categories that are of special concern are the non-aerosol Cleaners, Degreasers and Glass Cleaners. The limits proposed are 0.5%, 0.5% and 1.0% respectively. The limits are very low and will likely damage the product category. Unfortunately we have been fighting these for about two years with little success. We need some good arguments. I believe that CARB is considering raising the non-aerosol Glass Cleaner category above 1.0%. However, significant work has gone into this issue. Other categories that we should make specific arguments against are Specialty Lubricants category aerosol and non-aerosol. To lump greases, with gun oils, with graphite, PTFE and other lubes is just plain silly. Then to have a limit as low as the multi-purpose lubricant regulation is even sillier. Finally the total reduction in VOC of 0.28 TPD makes the proposal just ridiculous. Anyone with specialty lubes please send me some comments. Next heavy duty hand cleaner is being reduced to 1% from 8%. Possibility here is to split product that is waterless from product that uses water. In this way maybe we can get CARB some VOC reductions. Pesticides are always more difficult to deal with, any concerns with the Aerosol Flying Bug and Aerosol Wasp & Hornet.

The non-aerosol Automotive Rubbing or Polishing compounds are being reduced to 3% from 17% VOC. I would think this is a problem. Same with non-aerosol Automotive Wax/Polish/Sealant/Glaze being reduced from 15% to 3%. Any and all comments on these automotive products are welcome.

The last category is Metal Polish or Cleanser. My concern here is what about automotive products, such as chrome cleaners? Many manufacturers and marketers may not even be considering such products. I am relisting the categories and limits below. Please supply comments, concerns or anything else by Friday. I will be attempting to put together comments by Friday June 11 for CARB.

Product Category	Proposed VOC Limit (wt%)	Effective Date	VOC Reduction (tpd)	Current Limit
Cleaners and Degreasers				
General Purpose Cleaner: Non-aerosol	0.5	12/31/12	3.73	4
General Purpose Degreaser: Non-aerosol	0.5	12/31/12	0.45	4
Glass Cleaner: Non-aerosol	1.0	12/31/12	1.98	4
Oven or Grill Cleaner: Aerosol (Grill Cleaner only)	8	12/31/12	>0	8
Non-aerosol	4	12/31/12	-0.12	1
Laundry Care				
Spot Remover (Dry Clean Only): Aerosol	15	12/31/12	>0	25
Non-aerosol	3	12/31/12	0.17	8
Lubricants				
Silicone-based Lubricant	40	12/31/12	0.12	60
Special Purpose Lubricant: Aerosol	25	12/31/12	0.14	Not Regulated Not Regulated
Non-aerosol	3	12/31/12	0.14	
Personal Care Products				
Heavy-duty Hand Cleaner or Soap	1	12/31/12	0.52	8

Pesticides				
Flying Bug Insecticide: Aerosol	15	12/31/12	0.18	25
Wasp or Hornet Insecticide: Aerosol	5	12/31/12	0.23	40
Vehicle & Marine Vessel Aftermarket Products				
Automotive Rubbing or Polishing Compound: Non-aerosol	3	12/31/12	0.22	17
Automotive Wax/Polish/Sealant/Glaze	3	12/31/12	0.23	15
Waxes & Polishes				
Furniture Maintenance Product: Aerosol	10	12/31/12	0.50	17
Metal Polish or Cleanser: Aerosol:	15	12/31/12	0.07	30
Non-aerosol	0.5	12/31/12	0.21	30

Ozone Transport Commission (OTC)



Quick note, the Ozone Transport Commission will have their next meeting on June 3 in Baltimore. Currently, OTC is working on an updated Consumer Products Regulation. However, for this meeting the new revised Architectural Model Rule will likely be the focus of product regulations. I will keep you updated after the meeting.

South Coast Air Quality Management District



SCAQMD Rule 1144

SCAQMD is currently considering changes to Rule 1144 which effects the Industrial use of lubricant. Their hearing which was set for June 4, 2010 is being postponed until July 9. The maintenance and repair exemption is still included. But remember if your product is used in direct contact with a finished part, your product could be subject to the rule.

SCAQMD Rule 1143

SCAQMD is making adjustments to their Rule 1143 for Multi-purpose Solvent and Paint Thinner rule. Due to legal challenge by the WM Barr company the district must remove the second tier limit from their rule. SCAQMD is proposing this change for June 4. However, they are trying to re-adopt the limit in July. Currently on track, however, the district might consider amendments.

Green Chemistry

On June 9, 2010 the California Department of Toxic Substance Control is holding a Symposium on Alternative Analysis. If you remember from last year, Green Chemistry is an up and coming issue. One of the keynote speakers is Clive Davies from U.S. EPA Design for the Environment Program (DFE). This should be an interesting meeting.

This review is provided to keep you informed of ever changing regulations and legislation. Proactive involvement in these issues will provide for a more productive business atmosphere.

As always, any questions please call!

There are many issues affecting the industry, a proactive strategy is a way to ensure that your business is not adversely affected. Feel free to call with any questions at 440-474-4999 or e-mail to djaymond@reg-resources.com.

“The preceding is for your review only. The opinions expressed in this document are solely those of the author and are subject to change as new information is available.”