

**RAYMOND REGULATORY RESOURCES**  
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**3R REVIEW**

Volume 7, Issue 6  
June 2010

June was an especially busy month. Ozone Transport Commission, OTC, California Air Resources Board (CARB), South Coast Air Management District (SCAQMD) and California's Green Chemistry were all active this month.

On a personal note our youngest child, our daughter; graduated with honors from high school this month as well. We hosted a graduation party in her honor to well over 200 people at our home. She will be attending the University of Akron in Akron, Ohio starting this fall.

Please note that I will be out of the country with limited access to e-mails and/or phone starting July 9<sup>th</sup> through July 14<sup>th</sup>.

*Ozone Transport Commission (OTC)*



The OTC held a meeting in Baltimore on June 3 to discuss Consumer Products and Architectural Coatings among other topics that the OTC regulates. At the meeting the OTC voted to move forward with their model rule, however, they have not posted the rule. Members of industry requested some minor changes. The OTC said that they would work with the industry. The architectural coating regulation was voted to also be moved forward. This draft regulation is attached with this 3R Review. Most if not all of industries concerns were met by the OTC.

# CARB



Issues with CARB are heating up. The rule making as discussed in past issues is scheduled for November 2010. Industry has been meeting with CARB to try and make this a workable rule to date CARB has not been budging. Hopefully, the work in May & June by the industry will sway CARB into modifying some of their positions.

As a reminder the following is CARB proposal. Please review and comment soon. Time is running short!

Product Category	Proposed VOC Limit (wt%)	Effective Date	VOC Reduction (tpd)	Current Limit
<b>Cleaners and Degreasers</b>				
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
<b>Laundry Care</b>				
Spot Remover (Dry Clean Only): Aerosol	15	12/31/12	>0	25
Non-aerosol	3	12/31/12	0.17	8
<b>Lubricants</b>				
Silicone-based Lubricant	40	12/31/12	0.12	60
Special Purpose Lubricant: Aerosol	25	12/31/12	0.14	Not Regulated
Non-aerosol	3	12/31/12	0.14	Not Regulated

				Regulated
<b>Personal Care Products</b>				
Heavy-duty Hand Cleaner or Soap	1	12/31/12	0.52	8
<b>Pesticides</b>				
Flying Bug Insecticide: Aerosol	15	12/31/12	0.18	25
Wasp or Hornet Insecticide: Aerosol	5	12/31/12	0.23	40
<b>Vehicle &amp; Marine Vessel Aftermarket Products</b>				
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
<b>Waxes &amp; Polishes</b>				
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

CARB will be having another workshop at the end of July on this proposal.

**CARB Upcoming Limits**

The following limits will become effective 12/31/2010. If you cannot meet these limits let me know. CARB is performing a technical review.

Table 1  
Consumer Products Categories  
Associated VOC Standards Becoming Effective on December 31, 2010

Product Category	Effective Date (1)	VOC Standard (2)	Current Limit
Astringent/Toner (Non-FDA regulated)	12/31/2010	35	None
Brake Cleaner	12/31/2010	10	20
Carburetor or Fuel-injection Air Intake Cleaner	12/31/2010	10	20
Carpets/Upholstery			

Cleaner Aerosol	12/31/2010	5	7
Non-aerosol (ready to use)	12/31/2010	1	3
Dusting Aid Aerosol	12/31/2010	17	25
Non-aerosol	12/31/2010	3	7
Engine Degreaser Aerosol	12/31/2010	10	35
Fabric Protectant Non-aerosol	12/31/2010	1	60
Fabric Softener-Single use dryer product (all)	12/31/2010	0.05 Gram/use	None
Floor Maintenance Product	12/31/2010	1	None
Floor Polish or Wax Resilient Flooring Material	12/31/2010	1	7
Nonresilient Flooring Material	12/31/2010	1	10
Wood Floor Wax (All)	12/31/2010	70	90
General Purpose Degreaser Aerosol	12/31/2010	10	20
Motor Vehicle Wash Non-aerosol	12/31/2010	0.2	None
Odor Remover/Eliminator Aerosol	12/31/2010	25	None
Non-aerosol	12/31/2010	6	None
Pressurized Gas Duster	12/31/2010	1	None
Non-chemically Curing Sealant or Caulking Compounds Non-aerosol	12/31/2010	1.5	4
Temporary Hair Color Aerosol	12/31/2010	55	None
Tire or Wheel Cleaner Aerosol	12/31/2010	8	None
Non-aerosol	12/31/2010	2	None
Windshield Water Repellant	12/31/2010	75	None

- (1) See section 94509 (d) for the effective date of the VOC standards for products registered under FIFRA, and section 94509 © and (d) for the “sell-through” allowed for products manufactured prior to the effective date of standards.
- (2) See section 94510 (c) for an exemption that applies to fragrances in consumer products, and section 94510 (d) for an exemption that applies to LVP-VOCs.

Table 2  
Consumer Products Category  
Associated Global Warming Potential (GWP) Limit Becoming Effective on December 31, 2010

Product Category	Effective Date	GWP Limit (1)	Current Limit
Pressurized Gas Duster	12/31/2010	150	None

(1) Global Warming Potential value or “GWP value” as specified in the Intergovernmental Panel on Climate Change’s (IPCC) Second Assessment Report (SAR).

## *South Coast Air Quality Management District*



**SCAQMD Rule 1143**

**SCAQMD Rule 1144**

**SCAQMD Rule 1113**

SCAQMD has been very active. They will readopt the second term limit for Paint Thinner & Multipurpose Solvents in their Rule 1143 on July 9.

Also on July 9, SCAQMD is amending their Rule 1144 which effects industrial lubricants. Good news, the maintenance & repair exemptions are still included.

On July 8, SCAQMD will hold its first workshop on amending rule 1113 Architectural Coatings. This rule could be taken to the board as early as the end of this year.

### *Green Chemistry*

The draft regulation for Green Chemistry is out. It can be found at <http://www.dtsc.ca.gov/PollutionPrevention/GreenChemistryInitiative/upload/Safer-Product-Alternative-Regulations-6-23-10.pdf>

I have not yet reviewed the sixty-one pages. This is a very important issue. I will be back to you soon on a report.

At the end of July DTSC will hold its second symposium on this issue.

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*Please Note*

*3R will be on vacation from August 14<sup>th</sup> through August 23<sup>rd</sup>.*

*Please leave a message and be patient.*

*We will get back to you as soon as we can. We will be out of the country and will have limited access to e-mail and possibly will be without cell phone service. Thank you!!*



**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 [djraymond@reg-resources.com](mailto:djraymond@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.”**