

Regs

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Aerosol Crawling Bug

- Aerosol Crawling Bug category
 - VOC limit proposed 8% in 2030
 - CARB raised the proposed VOC limit from 6%
- Bed Bug category: a new product category formed in this rule development
 - VOC limit would remain at 15% after 2030

Two Percent Fragrance Exemption

The 2% Fragrance Exemption is proposed to sunset as of 2031 for most products except:

- Non-Aerosol General Purpose Cleaners and General Purpose Degreasers
 - These two categories are proposed to be granted a 0.25% monoterpene exemption that will be retained after 2031 and effective immediately after the rule is approved
- Air Fresheners, Disinfectants and Sanitizers
 - These categories are proposed to retain a 0.25% fragrance exemption after 2031

Definitions

There were changes to some of the above categories in order to clarify existing and new product categories. You are encouraged to read the draft language of the regulation; see the end of this column for the link.

MIR table

There are three compounds proposed to be added to the maximum incremental reactivity (MIR) table:

1. Diethyl Carbonate
2. HFO-1233zd
3. Alkane-Mixed Minimally 90% C13 and higher carbon number

Chlorinated solvents, GWP and PCBTF prohibitions

CARB is proposing to prohibit the use of chlorinated solvents, global warming potential (GWP) compounds greater than 150 and parachlorobenzotrifluoride (PCBTF) in the product categories having proposed new VOC limits.

IPE for compressed gas

CARB is proposing the use of the Innovative Product Exemption (IPE) for allowing the replacement of HFC-152a with CO₂, nitrogen or compressed gas as a way to reduce GWP emissions. Currently, as written, the proposal is flawed. Significant work will be needed to make this proposal feasible.

Energized Electrical Cleaner

CARB has modified its proposal for the definition for this category, proposing to prohibit the use of this product in automotive repair shops as well as sales from automotive retailers. While this is draconian wording, remember that since 2001, use of chlorinated solvents in automotive repair shops has been prohibited. The sales prohibition for automotive retailers is unfortunate. However, this wording allows the sale of this product by other compliant retailers. Thus, electricians and others can still purchase this safety product for use around energized equipment and it will remain available.

Aerosol PVC Pipe Cement

This is a new product category formed in this rule development. The proposed 60% VOC limit will be effective as soon as regulation is approved.

Multi-Purpose Solvent

A new provision is being added to the Multi-Purpose Solvent definition. This new provision exempts denatured alcohol products to public utilities.

Web-based claims

Big News! CARB is delaying work on using the website to classify products. This has been a significant issue for the Industry.

Method 310

Method 310 has been totally rewritten; industry needs to review all of the changes.

Next steps

- Comments were due by Nov. 24, 2020
- Jan. 8, 2021: The 45-day public comment period will begin with CARB releasing its final draft
- Feb. 25–26, 2021: There will be a CARB Board hearing for adoption of draft

Summary

Now is the time to comment on these draft amendments. Take the opportunity now to review the slides and draft wording. All the documents can be found at: <https://ww2.arb.ca.gov/our-work/programs/consumer-products-program/consumer-products-regulatory-activity-workshops>. This is likely the final draft and we need to review what is published on Jan. 8, 2021. **SPRAY**



Spanish aerosol production shows slight uptick...

Asociación Española de Aerosoles (AEDA) recently released Spain's aerosol production statistics for 2019. AEDA estimated that 2019 production totaled 328.8 million units, up 0.09% from 328.5 million in 2018. Statistical breakdowns for various product categories were not available. The research was conducted by LANT Abogados on behalf of AEDA. **SPRAY**



Pintyplus HOME, a range of water-based spray paints from Novasol Spray, launched in 2019.