

U.S. Aerosol production up to the challenge

Production decreases in 2019...

According to the 69th annual Household & Commercial Products Association's (HCPA) *Aerosol Pressurized Products Survey*, aerosol production dropped 4.8% in 2019.

The HCPA Aerosol Products Division Survey Committee worked with an independent third-party firm, Association Research, Inc., to administer the survey, analyze the data and compile the results. The proprietary data provided by each manufacturer is only known to Association Research, Inc. and is not shared with anyone else.



Results included:

Category	2019 Production	% Change over 2018	Containers	2019 Production	% Change over 2018
Insect Sprays	245,007,159	-14.0%	Aluminum	739,597,000	-5.06%
Paints & Finishes	463,517,980	+1.5%	Steel	2,882,428,824	-4.68%
Household Products	1,044,606,783	-8.2%	Total Metal	3,622,025,824	-4.76%
Personal Care	822,824,006	-5.1%	Plastic*	N/A	
Animal Products	1,351,113	+0.7%	Component	2019 Production	% Change over 2018
Auto/Lube/Industrial	503,019,000	-1.0%	Valves	3,461,821,780	-6.06%
Food Products	571,241,363	-1.1%	Bag-on-Valve (BOV)	222,930,000	+1.33%
Miscellaneous	19,089,877	-9.0%			
TOTAL FILLED	3,670,657,281	-4.8%			

*Association Research Inc. withheld plastic container figures as there were not enough respondents who manufacture using plastic containers; for confidentiality purposes, the one large player in that space was not disclosed.

Regulatory Issues

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- Incentives for the use of Compressed Gas Propellants instead of Liquified Gas Propellants. This use would need to be done through an Innovative Product Exemption.
- Prohibition of chlorinated compounds use proposed in these categories:
 - o Manual Air Freshener
 - o Hair Finishing Sprays
 - o Dry Shampoo
 - o Hair Shine
 - o Temporary Hair Color (Aerosol)
 - o Personal Fragrance Product (less than 10% Fragrance)
 - o Aerosol Crawling Bug Insecticide
- Potential prohibition of the use of parachlorobenzotrifluoride (PCBTF) in the above categories.
- Proposed retail ban of Energized Electrical Cleaner and Energized Electronic Cleaner, as well as the restriction of Energized Electronic Cleaner use in Automotive Maintenance. CARB has not given any sufficient reasons for these restrictions.
- Alternative Control Plan (ACP) changes.
 - o CARB proposes to limit the ACP products for those slightly under the limit. We need to review.
- Innovative Product Exemption (IPE)
 - o CARB proposes to eliminate products that use combustion to reduce VOC emissions.
- Web-based claims
 - o CARB is proposing the use of claims on company websites to classify product categories. This is a major departure from using only the label for this classification. We need to monitor the wording closely.

Comments were due by May 14.

April 20 Webinar

On April 20, 2020, CARB staff from the Monitoring & Laboratory Division held a webinar to discuss proposed changes to Test Method 310, which determines the amount of VOC or low vapor pressure (LVP) in products. This is a very important topic. Unfortunately, no comments were made by Industry and CARB staff quickly went through the presentation. The whole webinar lasted only 15 minutes. Thus, Industry needs to closely review these changes and comment back to CARB. The presentations for both the workshop and the webinar can be found at <https://ww2.arb.ca.gov/our-work/programs/consumer-products-program/regulatory-activity-workshops-meetings>.

VOC Fee

Finally, on May 1, 2020, CARB emailed the Fiscal Year Preliminary Fee Determinations for Fiscal Year 2020–2021 to companies that have total annual California sales of consumer products containing in aggregate 250 tons (or more) of VOCs. CARB will not be sending preliminary determinations through standard mail this year as it usually does.

Preliminary FY2020–2021 fee determinations are based on the 2015 Consumer & Commercial Product Survey and 2010 Aerosol Adhesives & Aerosol Coatings Survey data. Emissions were grown to a 2018 calculation base year using California Dept. of Finance population data.

After you receive this preliminary fee, your company should review this information. CARB staff will provide more information if needed. Your company has 60 days to challenge this preliminary fee. Therefore, you must send your challenge to the fee amount—in writing—to CARB before July 1, 2020.

STATE ACTIVITY

New York is still moving ahead with its VOC regulation and Vermont is getting on the bandwagon regarding hydrofluorocarbon (HFC) regulations. More to come in the next issue. STAY WELL! **SPRAY**