

Technical Brief

Volatile Organic Compounds: An Overview

VOC Regulations: 2010 Outlook

This past year saw many changes to Volatile Organic Compound (VOC) Regulations, particularly on the state level. There are now 15 states plus the District of Columbia that have comprehensive regulations limiting the VOC content in an array of consumer products categories. Fortunately there are very few changes for the beginning of 2010. This technical brief will review those changes and discuss what to expect in mid-2010 and beyond.

New in January 2010

- ▶ **New York** has amended their regulation to the **2006** version of the **OTC Model Rule**. The new regulation expands the number of regulated product categories and includes **chlorinated solvent restrictions** in eight (8) product categories. New VOC limits and restrictions are effective 01/01/2010. There is a sell through for products produced prior to this date. For products that do not meet the chlorinated solvent restrictions, the sell through is 1 year. All other products, produced before 01/01/2010, have an unlimited sell through.
- ▶ The **South Coast Air Quality Management District (SCAQMD)** in southern California has adopted VOC limits for paint thinners, multi-purpose solvents, vanishing oils and corrosion inhibitors used at industrial facilities. These limits are effective 01/01/2010. These regulations apply only to products used within this air district.

On the Horizon in 2010

- ▶ **Indiana** will adopt a VOC regulation. This regulation will be based on the **2006 OTC Model Rule** and may be effective mid-2010 if the final regulation is passed early in the year.
- ▶ **Virginia** plans to amend their current VOC regulation to the **2006** version of the **OTC Model Rule**. New VOC limits will be effective five months after the regulation is adopted.
- ▶ The **Ozone Transport Commission (OTC)** is planning to revise their model rule for consumer products. Revisions may be approved at their June meeting. Revisions would then have to be adopted by individual states.
- ▶ In **California**, the VOC limits for several product categories will be lowered as of 12/31/2010. Effected categories include brake cleaners, carburetor / fuel-injection air intake cleaners, aerosol engine degreasers and aerosol general purpose degreasers, among others.
- ▶ **The EPA** plans to propose an amendment to their consumer products VOC rule. Exact timing has not been determined.

How are VOC's regulated?

The EPA developed air quality standards for ground-level ozone and requires states to monitor and maintain 'safe' levels of ozone through permitting and regulatory initiatives. Some VOC's are more reactive than others and more readily produce smog. VOC's with a very low reactivity, such as acetone and perchloroethylene, are exempt from the regulations.

In order to meet the federal standards, several states have created regulations that limit the amount of VOC's in consumer products. California was the first state, in 1989, to set VOC limits by product type and category. Since then, they have amended their regulation several times to include new product categories and to lower some previously established limits. Other groups of states have followed California's lead. One group is called the Ozone Transport Commission (OTC) and includes Northeastern and Mid-Atlantic states. This group created 'Model' Consumer Products VOC Rules that can be adopted by member states. The first model rule was developed in 2001. A revised model rule with additional product categories was issued in 2006. Another group of states is the Lake Michigan Air Directors Consortium (LADCO) and consists of states that border Lake Michigan. This group has been adopting the Model Rules developed by the OTC. Most of the OTC and LADCO states have adopted one or both versions of the Model Rule and others are currently considering them.