Public Webinar for Proposed Amendments to the Consumer Products Regulations

July 28, 2020 9:00am-12:00pm PDT



Today's Meeting

Webinar Registration

https://attendee.gotowebinar.com/register/762590849317386 2667

To participate by phone:

TELEPHONE: (415) 655-0060

PASSCODE: 732-865-482

Draft Proposed Consumer Product Regulation Amendment language is available for stakeholder review at:

https://ww2.arb.ca.gov/our-work/programs/consumerproducts-program/regulatory-activity-workshops-meetings

Presentation Outline

- Overview and Background
- Draft Regulatory Proposals for VOC Reductions
- Proposed Regulatory Definitions
- Other Topics
- Next Steps

For Q & A: Please type in questions or comments using the 'Questions' tab on the webinar sidebar.

Overview and Background

- California Clean Air Act requires CARB to regulate consumer products
 - Achieve the maximum feasible volatile organic compound (VOC) reduction from consumer products
 - Regulations must be technologically and commercially feasible
 - Must not eliminate a product form
- Manufacturer innovation has enabled low-emission products
- More needed to meet federal air quality standards

VOC Reduction Commitments

By 2023: 1-2 tpd in South Coast





By 2031: 4-5 tpd in South Coast 8-10 tpd Statewide

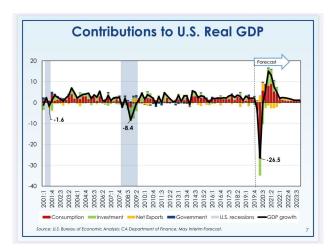
Updated Growth Projections

California Department of Finance has directed CARB to update growth factors that incorporate impact of recent recession

Personal Care Product VOC emissions

and reductions impacted most

- Growth projections tied to Real Disposable Personal Income
- ❖ VOC emissions and reductions about 5% lower VOC in 2023 and 2% lower in 2031



Draft Regulatory Proposal for VOC Reductions

- Manual Aerosol Air Fresheners
- Crawling Bug Insecticide
- Hair Care Products
 - Hair Finishing Spray
 - Dry Shampoo
 - ❖ Hair Shine
 - ❖Temporary Hair Color
- Personal Fragrance Products
- Sunset Fragrance Exemption

Revised Proposal Summary

VOC Reductions (tpd)

Category	Existing Standard	Proposed Standard ²	2023 Reductions			2031 Reductions	
			CA	SCAB	Standard ³	CA	SCAB
Manual Aerosol Air Freshener ¹	20% or 30%	10%	1.07	0.45	5%	1.73	0.72
Hair Finishing Spray	55%	50%	0.94	0.39	50%	1.11	0.45
No Rinse Shampoo	NA	55%	0.58	0.24	50%	0.78	0.32
Hair Shine	55%	55%	NA	NA	50%	0.02	0.00
Temporary Hair Color	55%	55%	NA	NA	50%	0.03	0.01
Personal Fragrance Products fragrance < 7% in 2023, 10% in 2031 ⁴	75%	70%	0.41	0.17	50%	5.05	2.07
Aerosol Crawling Bug Insecticide	15%	15%	NA	NA	6%	0.84- 0.88	0.40- 0.43
2% Fragrance Exemption	2% of product mass exempted	NA	NA	NA	Sunset Exemption	0.28	0.12
						9.84-	4.09-
		Total	2.99	1.24		9.88	4.12

- 1 'Concentrated Aerosol Air Freshener' and 'Total Release Air Freshener' subject to standards described on slide 9.
- 2 Proposed standards apply January 1, 2023.
- 3 Proposed standards apply between January 1, 2027 and January 1, 2031, depending upon category. Emission reductions for 2031.
- 4 Includes technology assessment in 2027.

Manual Aerosol Air Freshener Draft Proposal

- Combine single and double phase aerosol air freshener into "Manual Aerosol Air Freshener"
 10% VOC Standard by 2023, 5% VOC Standard by 2027
- Create three new aerosol air freshener categories:
 - ❖ 'Automatic Aerosol Air Freshener' retains 30% standard
 - * 'Concentrated Aerosol Air Freshener': 15% VOC by 2023, 10% by 2027
 - 'Total Release Air Freshener': 25% VOC by 2023

Aerosol Crawling Bug Insecticide

- ❖6% VOC standard applicable January 1, 2030
 - Implementation date extended by one year
- Exclude bedbug products
 - ❖Would retain existing 15% VOC limit
 - CARB staff quantifying emission reduction impacts

Hair Care Products Hair Finishing Spray

- Retain existing proposal for 50% VOC standard for 2023
- No longer proposing 45% VOC limit for 2029
 May revisit proposal in future rulemaking
- Definition update to further specify that "Hair Finishing Spray" is applied once all styling is complete

Hair Care Products Dry Shampoo

- Retain existing 55% VOC standard proposed for 2023
- ❖ Amend proposed standard for 2029 from 45% to 50% VOC
 - ❖May revisit proposal in future rulemaking
- Updated definition

Hair Care Products Temporary Hair Color

- ❖ Amend proposed standard for 2029 from 45% VOC to 50% VOC
 - May revisit proposal in future rulemaking
- Harmonize with proposed "Hair Finishing Spray", "Dry Shampoo", and "Hair Shine" VOC standards by 2029

Hair Care Products Hair Shine

- ❖ Amend proposed standard for 2029 from 45% VOC to 50% VOC
 - ❖May revisit proposal in future rulemaking
 - Most existing products meet proposed standard
- Updated Definition
 - Clarification of conditioning claims

Personal Fragrance Products

Previous Draft Proposal: Products < 10% Fragrance

- ❖68% VOC Standard by January 1, 2023
- ❖50% VOC Standard by January 1, 2027

Updated Proposal

- ❖70% VOC Standard by January 1, 2023 for:
 - Aerosol Personal Fragrance Products (regardless of fragrance content)
 - ❖Non-aerosol products less than or equal to 7% fragrance

Personal Fragrance Products Updated Proposal (cont.)

- ❖50% VOC Standard by January 1, 2031 for:
 - Aerosol Personal Fragrance Products (regardless of fragrance content)
 - ❖Non-aerosol products with less than or equal to 10% fragrance
- Provides additional time for products between 7% and 10% fragrance to reduce VOC
- Discourages companies from increasing fragrance content as compliance option

Personal Fragrance Products Proposed Technology Assessment of 2031 Standard

- \$\ddot*2026: Survey of 2025 calendar year product sales and formulations
- *****2026-27:
 - Review and analyze survey results
 - Industry reports efforts and progress meeting 2031 standard
 - *Assess 2031 standard, including feasibility of subcategories to meet alternate standards
- ❖2028: If 2031 standard is infeasible, CARB amends standard, proposes alternate strategies or categories to meet 2031 emission reduction commitment
- → Draft proposed regulatory language in Section 94513

Two-Percent Fragrance Exemption

- Proposal to sunset 2% fragrance exemption in 2031
 - Fragrance VOC content would count towards compliance with applicable VOC standards
 - Over 85% of regulated category products and VOC mass do not currently use the exemption
- Intended to increase transparency and equity, facilitate enforcement, and help address public health concerns
- Would allow additional flexibility for non-aerosol General Purpose Cleaners and General Purpose Degreasers (GPC/GPD)
 - GPC/GPD responsible for majority of fragrance exemption utilization
 - → Draft proposed regulatory language in Section 94510(c)

Two-Percent Fragrance Exemption

General Purpose Cleaners and Degreasers

- ❖0.25% of monoterpenes in non-aerosol GPC/GPD would be allowed as part of 2% fragrance exemption beginning in 2023
- ❖Non-aerosol GPC/GPD would retain 0.25% fragrance exemption in 2031 (inclusive of monoterpenes)

Two-Percent Fragrance Exemption Example Calculations

Example 1

Product A is subject to a 50% VOC standard. It contains:

- **❖**49% VOC
- ❖2% fragrance, which is 25% VOC and 75% LVP-VOC

This product would remain compliant with 50% VOC standard after 2% fragrance exemption sunset:

49% VOC + (2% * 0.25 VOC) = 49.5% VOC

Two-Percent Fragrance Exemption Example Calculations (cont.)

Example 2

A nonaerosol GPC (0.5% VOC standard) contains:

- **❖**0.5% VOC and;
- ❖0.20% monoterpenes; and
- ❖0.10% fragrance, which is 20% VOC and 80% LVP-VOC.

With the proposed 0.25% fragrance exemption, this product would be compliant:

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0.20 monoterpenes + (0.10% fragrance * 20% VOC) = 0.22% ≤ 0.25%
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For More Information

Work Group Meeting	1 st Meeting	2 nd Meeting	3 rd Meeting
Manual Aerosol Air Freshener	5/28/2019	10/17/2019	3/10/2020
Hair Finishing Spray	5/20/2019	10/10/2019	3/10/2020
Dry Shampoo	5/20/2019	10/10/2019	3/10/2020
Temporary Hair Color	3/10/2020	-	-
Hair Shine	3/10/2020	-	-
Personal Fragrance Products	6/25/2019	10/10/2019	3/10/2020
Crawling Bug Insecticide	7/2/2019	10/17/2019	-
Two-Percent Fragrance Exemption	9/20/2019	11/7/2019	3/10/2020

<u>CARB Consumer Products Regulatory Amendments webpage</u> (https://ww2.arb.ca.gov/our-work/programs/consumer-products-program/regulatory-activity-workshops-meetings)

Discussion & Questions

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Consumer Product Regulation Proposed Definition Updates (Section 94508)

Air Freshener Proposed Definition Updates

Section 94508(a)(6)

For products manufactured on or after January 1, 2023, "Air Freshener" includes the following subcategories (A-E):

(A) "Automatic Aerosol Air Freshener" is an aerosol "Air Freshener" that is labeled to be used exclusively in an Automatic Air Freshening Dispenser"

For the purposes of this subsection, "Automatic Air Freshening

Dispenser" is a device labeled to dispense product at a

pre-determined time or interval of time, under preset conditions, or due to sensor-activation.

- (B) "Dual Purpose Air Freshener/Disinfectant" means an aerosol "Air Freshener" that is designed or labeled for use as both a "Disinfectant" and an "Air Freshener," or is so represented on any sticker, label, packaging, or literature attached to the product container.
- (C) "Manual Aerosol Air Freshener" means an aerosol "Air Freshener," that is not an "Automatic Aerosol Air Freshener" or a "Dual Purpose Air Freshener/Disinfectant" ...

(subsections D and E on next slide)

Air Freshener Proposed Definition Updates (cont.)

Section 94508(a)(6)

For products manufactured on or after January 1, 2023, "Air Freshener" includes the following subcategories: ...

(subsections A through C on previous slide)

- (D) "Concentrated Aerosol Air Freshener" is a "Manual Aerosol Air Freshener" enclosed under pressure which (1) contains 15% or more fragrance, (2) is designed with a valve that permits the dispensing of no more than 185 microliters of product upon each activation, and (3) is sold in aerosol containers of two ounces or less by weight.
- (E) "Total Release Air Freshener" is an aerosol air freshener product enclosed under pressure which (1) dispenses all or most of its contents during a single application, and (2) is sold in containers of five ounces or less by weight.

Dry Shampoo Proposed Definition Update

Section 94508(a)(36):

"No Rinse ShampooDry Shampoo" means a product designed or labeled solely to be applied to dry hair that is dry to clean, absorb oil, or eliminate odor, and is subsequently removed from the hair by combing, brushing or toweling the hair and massaged or brushed/combed through the hair for the purpose of cleaning the hair without needing to be rinsed.

Note: Leave-in conditioners that make styling claims are currently included in the definition of "Hair Styling Products." CARB staff intent is that this would continue to apply.

Energized Electrical Cleaner Proposed Definition Update

Section 94508(a)(39):

"Energized Electrical Cleaner" means an "Electrical Cleaner" product that meets bothall three of the following criteria:

- 1) the product is labeled to clean and/or degrease electrical equipment, where cleaning and/or degreasing is accomplished can only be performed when electrical current exists, or when there is a residual electrical potential from a component such as a capacitor;
- 2) the product label clearly displays the statements: "Energized Equipment use only. Not to be used for motorized vehicle maintenance, or their parts."
- 3) the product is exclusively sold directly or through distributors to establishments which operate or maintain energized electrical equipment. Sales to automotive repair establishments are prohibited.

For the purposes of this subsection, "establishment" includes licensed electrical contractors and businesses that maintain energized electrical equipment.

Hair Finishing Spray Proposed Definition Update

Section 94508(a)(66):

"Hair Finishing Spray" means a consumer product that is designed or labeled for application to styled hair to provide sufficient rigidity, to hold, retain or finish the style of the hair for a period of time once styling is complete,. "Hair Finishing Spray" and includes aerosol hair sprays, pump hair sprays, spray waxes; color, glitter, or sparkle hair sprays products that make finishing claims; and products that are labeled for both a hair styling and finishing product. "Hair Finishing Spray" does not include spray products labeled for hair that are intended to aid in styling but do not provide labeled for finishing of a the hair style.

For the purposes of this subchapter, "finish" or "finishing" means the maintaining and/or holding of previously styled hair for a period of time a hairstyle once all styling is complete.

For the purposes of this subchapter, "styling" means the forming, sculpting, or manipulating the hair to temporarily alter the hair's shape.

Hair Finishing Spray Proposed Definition Update (clean version)

Section 94508(a)(66):

"Hair Finishing Spray" means a product that is labeled for application to hair once styling is complete, and includes products that are labeled for both styling and finishing. "Hair Finishing Spray" does not include products labeled for hair styling but not labeled for finishing the hair style.

For the purposes of this subchapter, "finish" or "finishing" means the maintaining and/or holding of a hairstyle once all styling is complete.

For the purposes of this subchapter, "styling" means forming, sculpting, or manipulating the hair to alter the hair's shape.

Hair Shine Proposed Definition Update

Section 94508(a)(68):

'Hair Shine' means any products designed labeled for the primary purpose of creating a shine when applied to the hair. 'Hair Shine' includes, but is not limited to, dual-use products designed primarily to impart a sheen to the hair. 'Hair Shine' does not include 'Hair Finishing Spray,' 'Hair Mousse,' or 'Hair Styling Product.,' or products whose primary purpose is to condition or hold the hair.

Hair Styling Product Proposed Definition Update

Section 94508(a)(69):

"Hair Styling Product" means a consumer product that is designed or labeled for the application to wet, damp or dry hair to aid in defining, shaping, lifting, styling and/or sculpting of the hair. "Hair Styling Product" includes, but is not limited to hair balm, clay, cream, creme, curl straightener, gel, liquid, lotion, paste, pomade, putty, root lifter, serum, spray gel, stick, temporary hair straightener, wax, spray products that aid in styling but do not provide finishing of a hair style, and leave-in volumizers, detanglers and/or conditioners that make styling claims. "Hair Styling Product" does not include "No Rinse Dry Shampoo," "Thermal Protectant," "Hair Mousse," "Hair Shine," "Hair Finishing Spray," or shampoos or conditioners that are rinsed from the hair prior to styling.

For the purposes of this subchapter, "finish" or "finishing" means the maintaining and/or holding of previously styled hair for a period of time a hairstyle once all styling is complete.

For the purposes of this subchapter, "styling" means the forming, sculpting, or manipulating the hair to temporarily alter the hair's shape.

Aerosol Crawling Bug Insecticide Proposed Definition Update

Section 94508(a)(75):

(A) "Bed Bug Insecticide" (to be defined)

(AB) "Crawling Bug Insecticide" means any insecticide product that is designed for use against ants, cockroaches, or other household crawling arthropods, such as mites, silverfish or spiders. "Crawling Bug Insecticide" does not include "Bed Bug Insecticide" or products designed to be used exclusively on humans or animals, or any house dust mite product. For the purposes of this definition only:

"House dust mite product" means a product whose label, packaging, or accompanying literature states that the product is suitable for use against house dust mites, but does not indicate that the product is suitable for use against ants, cockroaches, or other household crawling arthropods.

"House dust mite" means mites which feed primarily on skin cells shed in the home by humans and pets and which belong to the phylum Arthropoda, the subphylum Chelicerata, the class Arachnida, the subclass Acari, the order Astigmata, or the family Pyroglyphidae.

Web-Based Claims ('Label' and 'Labeled' Definitions)

- Intent to reduce off-label usage and excess VOC emissions by ensuring consistency between manufacturer product label and internet claims
- Staff has proposed two regulatory definition updates:
 - ❖More holistic definition of label to include a manufacturer's internet claims (Section 94508(a) (77) and (78))
 - ❖Update to 'Most Restrictive Limit' criteria (Section 94512(a))
- Concerns raised regarding potential unintended consequences

Other Definition Updates

Section 94508(a)(1): 'Aerosol Adhesive'

- Targeted amendment to 'Special Purpose Spray Adhesive' definition to exclude aerosol adhesives labeled to bond plastic pipe
 - ❖Aerosol PVC pipe cement would be otherwise classified as 'Mist Spray Adhesive' (subject to 30% VOC limit)
 - New category was not evaluated when lower Aerosol Adhesive limits were set. Higher VOC limit may be considered.
 - ❖Anticipate low sales, negligible VOC increase

Section 94508(a)(88)(B): 'Multi-Purpose Solvent'

- Exclude denatured alcohol products used exclusively to maintain electrical equipment at public utilities
 - Discussions with utilities indicate that some equipment can only be cleaned with denatured alcohol
 - Critical public and safety and flammability issue
 - ❖Anticipate negligible VOC increase

Discussion & Questions

For webinar attendees:

Please type in questions or comments using the Questions tab on the sidebar

Other Topics

Chlorinated Solvents Prohibition in Regulated Categories

- ❖Table 94509(m)(1)(A): Propose prohibition on use of Methylene Chloride, Perchloroethylene, and Trichloroethylene in:
 - ❖ Manual Aerosol Air Freshener
 - Hair Finishing Spray
 - ❖No Rinse Shampoo
 - ❖ Hair Shine
 - ❖Temporary Hair Color
 - ❖Personal Fragrance Products
 - ❖Aerosol Crawling Bug Insecticide
- Negligible usage in these categories
- Pre-empts any potential for increase, consistent with previous rulemakings

Parachlorobenzotrifluoride (PCBTF Prohibition in Regulated Categories)

- California Office of Environmental Health Hazard Assessment expected to finalize a Cancer Inhalation Unit Risk Factor for this Exempt VOC this Summer
- ❖ Table 94508(m)(1)(B): Propose prohibition on use of PCBTF in:
 - ❖ Manual Aerosol Air Freshener
 - Hair Finishing Spray
 - ❖No Rinse Shampoo
 - ❖ Hair Shine
 - ❖Temporary Hair Color
 - ❖Personal Fragrance Products
 - ❖ Aerosol Crawling Bug Insecticide
- Negligible usage in these categories

Prohibition on Compounds with GWP>150 in Proposed Regulated Categories

- ❖ In Table 94509(n)(1), propose adding to table of categories in which chemical compounds with GWP > 150 are prohibited:
 - ❖ Manual Aerosol Air Freshener
 - Hair Finishing Spray
 - ❖No Rinse Shampoo
 - ❖ Hair Shine
 - ❖Temporary Hair Color
 - ❖ Personal Fragrance Product categories
 - Aerosol Crawling Bug Insecticide
- ❖ Use of HFC-134a already prohibited in these categories by CARB HFC Regulation (adopted March 2018) and California Cooling Act (Senate Bill 1013)
 - ❖ Addition of these categories to Table 94509(n)(1) would provide additional clarity within the Consumer Product Regulation regarding their prohibition

Innovative Product Exemption (IPE)

Clarify that combustion products are ineligible (due to potential increase in non-VOC pollutants)

Proposed Eligibility Criteria

Section 94511(c):

A consumer product which reduces VOC emissions relative to the representative consumer product due to VOC combustion (including, but not limited to, catalytic combustion) shall be ineligible for an exemption provided per section 94511(a).

Compressed Gas Propellants

- Considering amendments to the IPE process to encourage greater use of compressed gas propellants
 - Evaluating regulatory incentives for use of compressed gas propellants instead of HFC-152a
- Opportunities to achieve emission reductions via compressed gases vary by formulation and category

Test Methods

- Section 94515: Proposed modified language intended to increase consistency with Test Method 310
- Additional information in July 2, 2020 Webinar material at:

https://ww2.arb.ca.gov/ourwork/programs/consumer-productsprogram/regulatory-activity-workshops-meetings

Article 3: Regulation for Reducing Ozone Formed from Aerosol Coating Product Emissions

Section 94526(a): Test Methods and Compliance Verification

(1) The ingredients and the amount of each ingredient of all aerosol coating products subject to the provisions of this article shall be determined by the procedures set forth in "California Air Resources Board Method 310, Determination of Volatile Organic Compounds (VOC) in Consumer Products and Reactive Organic Compounds (ROC) in Aerosol Coating Products," (Method 310) adopted September 25, 1997, and as last amended on August 1, 2014 [insert date of amendment], which is incorporated herein by reference. Only ingredients present in amount equal to or greater than 0.1 percent by weight will be reported.

Section 94526(a): Test Methods and Compliance Verification(cont.)

- (2) Metal Content. The metal content of metallic aerosol coating products shall be determined by ASTM D5381-93, Standard Guide for X-Ray Fluorescence (XRF) Spectroscopy of Pigments and Extenders (Reapproved 2009), which is incorporated herein by reference.
- (3) Specular Gloss. Specular gloss of flat and non-flat coatings shall be determined by ASTM D523-08, Standard Test Method for Specular Gloss (June 1, 2008), which is incorporated herein by reference.
- (4) Acid Content. The acid content of rust converters shall be determined by ASTM D1613-06, Standard Test Method for Acidity in Volatile Solvents and Chemical Intermediates Used in Paint, Varnish, Lacquer, and Related Products (April 1, 2006), which is incorporated herein by reference.

Maximum Incremental Reactivity Table Section 94700: MIR Values for Compounds

- Propose adding three MIR values to Section 94700 based upon stakeholder input:
 - ❖ Diethyl Carbonate: 0.71
 - ❖1-Chloro-3,3,3-Trifluoropropene (HFO-1233zd): 0.04
 - Alkane Mixed Minimally 90% C13 and higher carbon number: 0.60
- Would provide additional flexibility for these less reactive substances

Article 4: Alternative Control Plan Regulation for Consumer Products and Aerosol Coating Products

94542. Definitions

Section 94542(a)(14) "LVP" or "LVP Compound" means a low vapor pressure VOC which shall have the same meaning as "LVP-VOC", as defined in Article 2, § 94508(a).

- (A) has a vapor pressure less than 0.1 mm Hg at 20 degrees Centigrade, or
- (B) if the vapor pressure is unknown, has more than 12 carbon atoms.

94547. Surplus Reductions and Surplus Trading

(b)(11) Beginning on January 1, 2024, in order to generate surplus reductions, a product with a VOC Standard per section 94509(a) that falls within the ranges in Table 94547(b)(11) 'Column A' may not exceed the corresponding percent of that standard identified in Table 94547(b)(11) 'Column B'.

<u>Table 94547(b)(11):</u>

Product Maximum Allowable VOC Content Relative to Applicable Standard

Column A	Column B	
20% < VOC Standard < 100%	<u>97%</u>	
1% < VOC Standard < 20%	<u>95%</u>	
VOC Standard < 1%	<u>90%</u>	

Next Steps

- Ongoing: Meet with interested stakeholders
- ❖ Fall 2020: Additional public meetings, as needed, to finalize/address outstanding issues
- December 4, 2020: Proposed Consumer Product Amendments and associated documents published for 45-day public comment period
- January 28, 2021: Proposed regulatory amendments for Board consideration

CARB Regulatory Development Staff

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Hair Finishing Spray and Dry Shampoo	Barbara Zavala	Barbara.Zavala
Hair Shine	Maryana Visina	Maryana.Visina
Temporary Hair Color	Lucy Negrete	<u>Lucy.Negrete</u>
Personal Fragrance Products	Robert Barrera	Robert.Barrera
Aerosol Crawling Bug Insecticide	Narci Gonzalez	<u>Narci.Gonzalez</u>
Fragrance Exemption Sunset	Josh Berghouse	Josh.Berghouse
Chlorinated Solvents Prohibition	Nicholas Berger	<u>Nicholas.Berger</u>
Table of MIR Values	Irina Malkina	<u>Irina.Malkina</u>
Energized Electrical Cleaner Definition	Josh Berghouse	Josh.Berghouse
ACP and IPE Eligibility Criteria	Joe Calavita	Joe.Calavita
Web-Based Product Claims	Josh Berghouse	Josh.Berghouse
Test Method 310	Keith Kennedy	<u>Keith.Kennedy</u>

Please provide comments by August 28th to: csmrprod@arb.ca.gov

Comments should be in ADA-compliant format (or in MS Word) if intended for posting to CARB website. For more information on ADA compliance for PDF documents go to the <u>Adobe Acrobat Creating and Verifying PDF Accessibility webpage</u> (https://helpx.adobe.com/acrobat/using/create-verify-pdf-accessibility.html)

Discussion & Questions

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