

Discussion of CARB Proposals to Revise The Definition of 'Energized Electrical Cleaner' in the Consumer Products Regulation

Public Webinar
October 29, 2020
9:00am - 11:00am (Pacific Time)



CARB stakeholder discussion. Data is
preliminary.

Today's Meeting

[Webinar Registration](https://attendee.gotowebinar.com/register/577274801177569548)

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To participate by phone:

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ACCESS CODE: 223-311-135

Outline

- ❖ Consumer Products Program Background
- ❖ Overview of Current Regulatory Effort
- ❖ Review of Automotive ATCM
- ❖ ‘Energized Electrical Cleaner’ Category Background
- ❖ Automotive Market Endpoints
- ❖ Proposed Definition Update
- ❖ Questions
- ❖ CARB Contact Information and Next Steps

Please type in questions or comments using the ‘Questions’ tab on the webinar sidebar.



The Mission of the California Air Resources Board

To promote and protect public health, welfare and ecological resources through the effective and efficient reduction of air pollutants while recognizing and considering the effects on the economy of the state.

Consumer Products Program Background

- ❖ Consumer Products Program began in 1989
 - Over 100 consumer products categories
 - Intended to control VOC emissions that lead to the formation of photochemical smog, as well as toxic air contaminants
- ❖ California Clean Air Act requires CARB to regulate consumer products
 - Achieve the maximum feasible reduction in volatile organic compounds from consumer products
 - Regulations must be technologically and commercially feasible
 - Must not eliminate a product form

Overview Of Current Regulatory Effort

❖ Lower VOC Standards in Certain Categories

- Hair Care Products
- Aerosol Air Fresheners
- Personal Fragrance Products
- Aerosol Crawling Bug Insecticide
- Two percent fragrance exemption sunset

❖ Additional Measures

- Innovative Products, Alternative Control Plan
- Additional toxics prohibitions
- Energized Electrical Cleaner Definition

❖ Link for more information:

- <https://ww2.arb.ca.gov/our-work/programs/consumer-products-program/consumer-products-regulatory-activity-workshops>

Automotive Air Toxics Control Measure and Toxics Prohibitions In Electrical Cleaners

- ❖ Automotive Air Toxics Control Measure (ATCM) prohibited the sale and use of automotive cleaning and degreasing products containing perchloroethylene, methylene chloride, and trichloroethylene.
 - Effective June 30, 2001.
- ❖ VOC Limits and Toxics Prohibitions in Electrical Cleaners became effective in 2006.
- ❖ Separate “Energized Electrical Cleaner” category was defined for narrow use on electrically energized equipment only.
 - Toxics not prohibited for this category

Automotive Air Toxics Control Measure and Toxics Prohibitions In Electrical Cleaners cont.

- ❖ Current definition of “Energized Electrical Cleaner”:
- ❖ (39) “Energized Electrical Cleaner” means a product that meets both of the following criteria:
 - 1) the product is labeled to clean and/or degrease electrical equipment, where cleaning and/or degreasing is accomplished 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.”

“Energized Electrical Cleaner” does not include “Electronic Cleaner.”

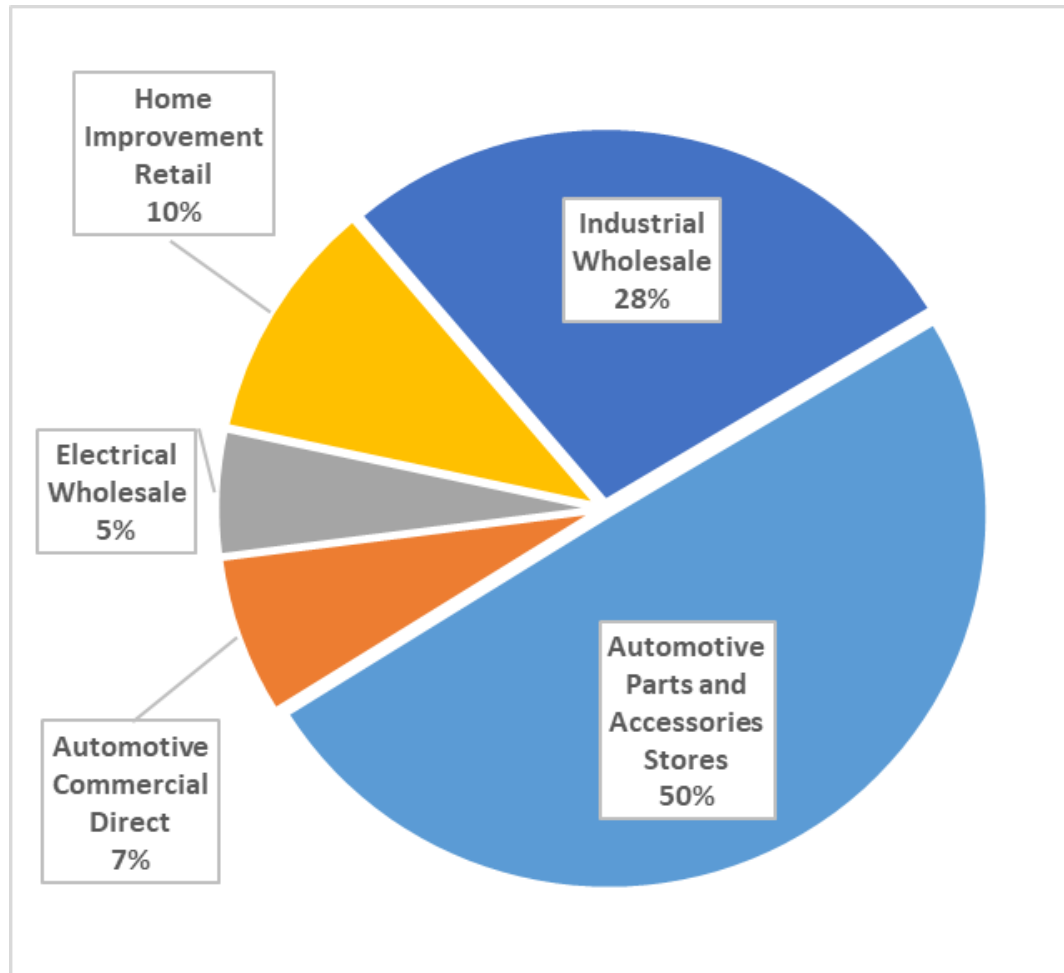
Automotive Air Toxics Control Measure and Toxics Prohibitions In Electrical Cleaners cont.

- ❖ Staff acknowledged potential for the automotive use of energized electrical cleaners in violation of the ATCM, so the additional labeling requirement for these products was adopted as part of the definition.
 - “Energized Equipment use only. Not to be used for motorized vehicle maintenance, or their parts.”
- ❖ Current CARB data shows that automotive sales of energized electrical cleaners persists, despite this labeling requirement.

Why is CARB concerned about Toxic Air Contaminant (TAC) and VOC emissions from Energized Electrical Cleaner?

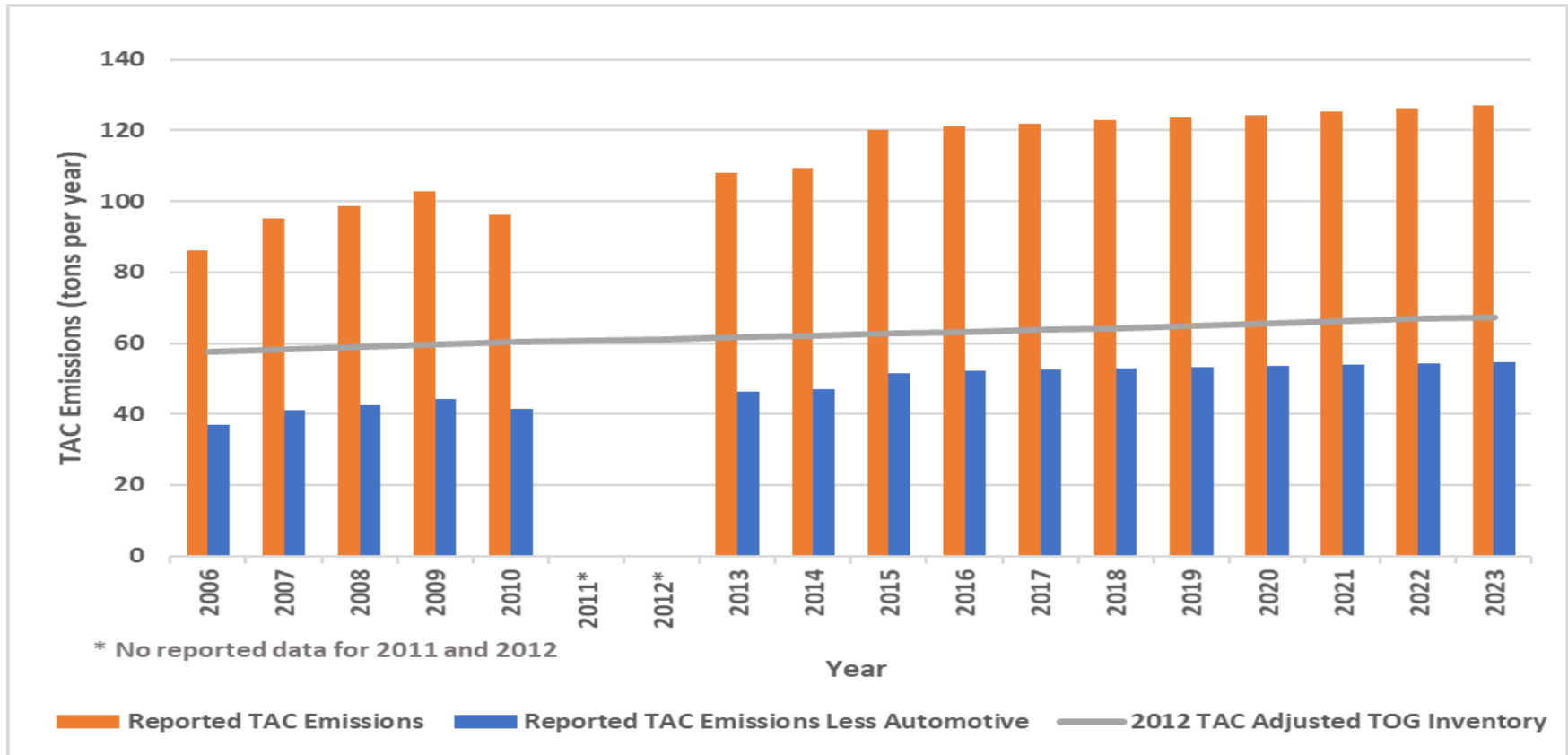
- ❖ Responsible for over 75% of perchloroethylene (TAC) and 50% of trichloroethylene emissions (VOC and TAC) from consumer products
- ❖ Market data shows that, notwithstanding the labeling requirement in the regulation, a substantial fraction of EEC product sales had automotive endpoints
- ❖ Revised definition would exclude products sold to automotive repair establishments and sold by establishments identified as an “Automotive Parts and Accessories Store” from the EEC definition

Issue: Significant Automotive Endpoints in Retail and Commercial Sales of Energized Electrical Cleaner



Expected, Actual, and Projected TAC Emissions from Energized Electrical Cleaners

- ❖ TAC emissions are twice as high from the EEC category than expected



Intent of CARB's Proposal

- ❖ Prevent the use of Energized Electrical Cleaners containing toxic air contaminants for automotive maintenance and repair activities by changing the category's definition to exclude
 - Products sold to “Automotive Maintenance Facilities” or “Automotive Repair Facilities”
 - Products sold by establishments identified as an “Automotive Parts and Accessories Store”
- Products sold this way would not be considered “Energized Electrical Cleaners”. Most would then be subject to either the “Electrical Cleaner” or “General Purpose Degreaser” definitions where toxics are prohibited

What definition changes has CARB proposed to address this issue?

“Energized Electrical Cleaner” means a product that meets the following criteria:

(A) 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;

(B) the product label clearly displays the statements: “Energized Equipment use only. Not to be used for motorized vehicle maintenance, or their parts;” and

(C) “Energized Electrical Cleaner” does not include

1. “Electronic Cleaner;”

2. Products manufactured on or after January 1, 2023 that are sold to “Automotive Maintenance Facilities” or “Automotive Repair Facilities,” as defined in California Code of Regulations, title 17, section 93111(c)(4); or

3. Products manufactured on or after January 1, 2023 that are sold by establishments identified as an “Automotive Parts and Accessories Store” or by code 441310 in NAICS.

For the purposes of this subchapter, NAICS means the North American Industry Classification System United States, 2017, Executive Office of the President, Office of Management and Budget, which is incorporated by reference herein.



Discussion & Questions

For webinar attendees: Please type in questions or comments using the Questions tab on the sidebar

Next Steps

- ❖ November 10, 2020: Final Workshop to Discuss Proposed Regulatory Amendments
- ❖ January 8, 2021: Final Proposal Regulatory Support Documents Publicly Available
- ❖ February 25-26, 2021: Proposed Regulatory Amendments for Board Consideration
- ❖ Link for more information:
- ❖ <https://ww2.arb.ca.gov/our-work/programs/consumer-products-program/consumer-products-regulatory-activity-workshops>

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Thank You For Attending!