

VOC Regulation for Aerosol Products:

Many states are concerned about VOC emissions because they contribute to the formation of low level ozone and smog. Most have adopted rules to limit the VOC emissions from industrial/stationary sources already as well as motor vehicles. California was the first state to put limits on the emissions from consumer products. As California's population has grown, the emissions from consumer products have continued to rise even with the lower VOC content in consumer products. That is why they continue to adopt even lower VOC levels for consumer products and lead the nation with the lowest VOC limits. Other states are considering regulation as well and there are two groups of states that have already adopted VOC rules for consumer products. They are the OTC and LADCO states.

The OTC (Ozone Transport Commission) is an association of states in the Northeast and is tasked with developing regional strategies for controlling air quality. For Consumer Products, they developed a VOC rule modeled after California's 2002 version of the Consumer Product VOC Rules. Once the OTC completed the model rule, it was up to each state to adopt their own rule based on the OTC model. There are a few differences in the rules developed by the individual states but for the most part they are the same. The OTC continues to monitor CARB (California Air Resources Board) activity and new revisions of the Consumer Products rules. The OTC has adopted some of the new revisions into the model rule and the OTC states have followed by revising their rules. The OTC states are Connecticut, District of Columbia, Delaware, Maine, Maryland, Massachusetts, New Hampshire, New Jersey, New York, Pennsylvania, Rhode Island, Vermont and Virginia.

The LADCO (Lake Michigan Air Directors Consortium) is the same type of association as the OTC. The LADCO states are Illinois, Indiana, Michigan and Wisconsin. They have adopted rules similar to the OTC rules.

You will find notes in our Camie literature as well as on our Web site and product labels regarding the VOC compliance of our products. Some of our products are restricted from use in CA. Some are also restricted from use in OTC and LADCO states. Since the individual states in the OTC and LADCO must adopt their own rules, the dates of adoption and effective dates are not the same for each state. There are sell through periods for products manufactured prior to the effective dates which are usually 3 years or more. Camie tracks our inventory of product to ensure that we do not ship non-compliant product to regulated states. However if you sell to restricted states but are not located in those states, it is important for you to contact us to see if your inventory is eligible to be sold during the sell through period.

VOC Regulation for Bulk Products:

There are VOC limits on products supplied in liquid form as well. CA, OTC and LADCO states have adopted industrial adhesives rules and coatings rules that limit the VOC content of products that can be used. Many states limit VOC usage in the user's air permit which may apply to other categories of products. The limits are based on the end use of the products which makes it very difficult for a distributor to know what VOC content product is needed. It is important to ask the user if they have checked the applicable VOC rules and know what VOC is acceptable for their application. We provide the VOC content of our products on the MSDS for all products. It is on page 6 or 7 in Section 16 and is expressed in several different forms. The end user should check the VOC of the product before purchase.