



2651 Warrenville Road, Suite 300 | Downers Grove, IL 60515 | Ph: (630) 543-7600 | www.plzaeroscience.com

Regulatory Technical Brief: Volatile Organic Compound (VOC) Regulations

What are VOC's?

VOC's are volatile organic compounds that evaporate into the atmosphere at ambient temperatures. VOCs contribute to ground level ozone or 'smog'. The percent VOC of a product is a weighted calculation based on the concentration and the VOC content of the specific ingredients in the formula.

Who regulates VOC's?

Air quality standards have been implemented at the Federal (EPA), State and local levels with the goal of improving air quality. The most stringent VOC restrictions have been implemented by the State of California. The California agency that regulates and enforces VOC restrictions for Consumer Products is the California Air Resources Board (CARB). Therefore, if a product is compliant in California, it is considered a '50 State' compliant product.

Other states have also adopted Consumer product VOC regulations. Two groups of States that have done so are the Ozone Transport Commission (OTC) and the Lake Michigan Air Directors Consortium (LADCO). Not all of the member States of these groups have adopted rules. The OTC States that have adopted rules are: DC, MA, ME, NJ, NY, PA, VA, CT, DE, MD NH, and RI. The LADCO States that have adopted rules are: IL, IN, MI and OH.

There are also two independent States that have rules at this time: Colorado and Utah. As of this writing, all of these States have based their rules on Phase III or Phase IV of the Model Rules developed by the OTC.

In addition, some localities within regulated States that have problematic smog levels have implemented restrictions by zip code. Lastly, the remainder of the States do not have State restrictions but will fall under Federal EPA VOC rules. Refer to www.plzaeroscience.com/voc-guidelines/

How are VOC restrictions determined?

Products are categorized according to detailed definitions of use or application. For example, a glass cleaner label has to state that it is only used to clean glass in order to fall into the VOC category for glass cleaners. If the product labeling indicates it cleans glass and other surfaces, it is then categorized as a multi-purpose cleaner with a different VOC limit. Correct wording on product labels and websites are critical to avoid violations.

Where can more information about these regulations be found?

California Regulation for Reducing Emissions From Consumer Products

https://ww3.arb.ca.gov/consprod/regs/2019/article_2_final_5_2019.pdf

Ozone Transport Commission (OTC) Model Rules/Regulatory & Technical Guidelines

<https://otcair.org/document.asp?fview=modelrules>

Lake Michigan Air Directors Consortium

<https://www.ladco.org/reports/policy-support/>

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July 2020