

SCRUBS®



VOLATILE ORGANIC COMPOUND GUIDE

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REGULATORY OVERVIEW

WHAT ARE VOCS?

The acronym VOC stands for "Volatile Organic Compound". In general, VOCs are chemicals that contain carbon and evaporate at room temperature and pressure. The term includes all sorts of common solvents as well as gases (e.g. mineral spirits, xylene, propane).

WHY ARE WE CONCERNED ABOUT VOCS?

VOCs evaporate and chemically react with car emissions and other pollutants to form ground-level ozone (i.e. smog). Ozone is a reactive molecule that attacks the lungs. Therefore, smog contributes to respiratory problems such as asthma, pneumonia and bronchitis.

HOW ARE VOCS REGULATED?

VOCs can be regulated by various levels of the government: federal, state and local. The U.S. Environmental Protection Agency (EPA) has established 'safe' levels of ground-level ozone and developed air quality standards to ensure compliance. In order to meet EPA's standards, several states adopted regulations that limit the amount of VOCs in consumer products by product type and category. These regulations are generally referred to as the Consumer Product Regulations.

Although Federal regulations do exist, they have been largely obsoleted by stricter state-level regulations. The California Air Resources Board (CARB) has developed some of the strictest regulations in the country and continues to adopt lower VOC limits. The Ozone Transport Commission (OTC) has developed Model Rules that member states can use as a guide for their own Consumer Product Regulations. The most recent version (OTC Phase V) has yet to be adopted by any OTC state.

The air quality in some areas of the country, most notably southern California, is so poor that local governments decided there was a need to further limit VOCs. The main difference between these local regulations and the state-level Consumer Product Regulations is the approach they take. The Consumer Product Regulations restrict the SALE OF certain products while local rules generally restrict the USE OF products in certain applications. Also, the Consumer Product Regulations do not regulate industrial products (those used in the manufacturing process) while local rules typically cover any product if it is used in a particular application. This requires the end-user to make informed decisions about which products are compliant for their particular use. Local regulations, especially those in California's South Coast Air Quality Management District (SCAQMD), can be very confusing. Since the type of discussion that would be required to explain these rules is beyond the scope of this guide, we recommend partnering with product manufacturers and distributors/retailers to determine the exact impact of these regulations on your business.

WHAT IS A CONSUMER PRODUCT?

The Consumer Products Regulations define a consumer product to be a chemically formulated product used by household and institutional consumers. Basically, unless the product is used in a manufacturing process, it is a consumer product and must meet the VOC limits specified in the Consumer Products Regulations in order to be sold.

WHAT DOES "NOT FOR RETAIL SALE - FOR USE IN THE MANUFACTURING PROCESS ONLY" MEAN?

Consumer Products Regulations allow the sale of high-VOC lubricants and general purpose degreasers if these products are sold exclusively to establishments that manufacture or construct goods or commodities and are labeled as follows:

- In states adopting OTC Model Rule: "not for retail sale"
- In California: for "use in the manufacturing process only"

WHAT IS THE DISTRIBUTOR'S RESPONSIBILITY?

When the sale of a product is regulated, the distributor is responsible for selling VOC compliant products in affected states and ensuring that products labeled "Not for retail sale - for use in the manufacturing process only" are sold exclusively to manufacturing establishments. Enforcement action, including fines, could be taken against a distributor that fails to comply with sales restrictions

WHAT DOES ITW PRO BRANDS OFFER AS A SOLUTION?

ITW Pro Brands provides a wide variety of 50 State Compliant products and continuously monitors developments affecting consumer products to ensure its customers have the latest information available. We offer this VOC Guide (URL: https://www.itwprobrands.com/files/technicaldocs/L1924_ITW_Pro_Brands_VOC_Guide_230418-10.pdf) to assist our customers in determining the compliance status of regulated products.

CONSUMER PRODUCT REGULATION - 2023 UPDATE

JURISDICTION	REGULATION
California	CARB Consumer Products
DC, IL, IN, MA, ME, MI, NJ, OH (until 7/1/23), PA, VA ¹	OTC Phase II
CO, CT, DE, MD, NY, OH (beginning 7/1/2023), RI, NH, UT ²	OTC Phase III/IV
Canada (effective 1/1/2024)	Volatile Organic Compound Concentration Limits for Certain Products

Northern VA, Fredericksburg and Richmond VOC Emission Control Areas

² Box Elder, Cache, Davis, Salt Lake, Tooele, Utah, Webber Counties

The following spreadsheet discusses the compliance status of affected LPS®, SCRUBS® and Dymon® products with regard to Consumer Product Regulations adopted by various states. Products not listed are not currently regulated. For questions regarding how other regulations, such as SCAOMD rules, affect ITW Pro Brands' products, please contact our Technical Department at 800-241-8334.

Products listed as MUO (manufacturing use only) are labeled and formulated for industrial users. These products do not meet VOC limits for household and institutional consumer use.

Compliant: Meets VOC regulations

Non-Compliant: Does not meet VOC regulations

<u>MUO (Manufacturing Use Only):</u> Product can be sold to manufacturers but not to the general public



	PRODUCT	US Part #	CANADA Part #	CA	IL, IN, ME, MA, MI, NJ, OH (until 7/1/23) PA, VA & DC	DE, NH, MD, CT, RI, CO, NY, OH (effective 7/1/23) and UT	CANADA	ALTERNATIVE Product	50 STATE VOC COMPLIANT?
NTS	LPS MAX 1™	90116	-	Compliant	Compliant	Compliant	Compliant		Yes
VETRA	LPS MAX 2™	90216	-	Compliant	Compliant	Compliant	Compliant		Yes
TS/PEI	LPS® MAX Heavy-Duty Silicone	91516	-	Compliant	Compliant	Compliant	Compliant		Yes
LUBRICANTS/PENETRANTS	LPS® MAX KB 88	92316	-	Compliant	Compliant	Compliant	Compliant		Yes
LUBR	LPS® MAX ChainMate®	92416	-	Compliant	Not regulated	Not regulated	Compliant		Yes
	LPS® MAX CFC Free	93116	-	Non-Compliant	Non-Compliant	Non-Compliant	Non-Compliant	95416 - LPS® MAX CFC Free NU	No
ELECTRONIC	LPS® MAX CFC Free NU	95416	-	Compliant	Compliant	Compliant	Compliant		Yes
ELECT	LPS® MAX NoFlash® 2.0	97416	-	Compliant	Compliant	Compliant	Compliant		Yes
	LPS® MAX Electro Contact Cleaner	90416	-	Compliant	Compliant	Compliant	Compliant		Yes
	LPS® MAX PreSolve®	91420	-	MU0*	MUO*	MUO*	MUO*	06420 - G-49™	No
INDUSTRIAL Degreasers	LPS® MAX Instant Super Degreaser 2.0	97220	-	MU0*	MUO*	MUO*	MUO*	04416 - REVO 66, 04320 - A-151	No
INDUS	LPS® MAX ZeroTri®	93520	-	MU0*	MUO*	MUO*	MUO*	05220 - EVR	No
	LPS® MAX Orange Degreaser	97320	-	Compliant	Compliant	Compliant	Compliant		Yes



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	LPS DETEX® FOOD GRADE Silicone Lubricant	01716	C01716	MUO*	MUO*	MUO*	MUO*		No
۶s	LPS DETEX® Heavy Duty Silicone Lubricant	51516	C51516	Compliant	Compliant	Compliant	Compliant		Yes
LUBRICANTS/PENETRANTS	LPS DETEX® FOODLUBE® Synthetic Chain Spray	57616	-	Compliant	Not regulated	Not regulated	Compliant		Yes
PENE	LPS DETEX® FOODLUBE® Sugar Dissolving Fluid	57716	-	Compliant	Compliant	Compliant	Compliant		Yes
ANTS/	LPS DETEX® FOODLUBE® Penetrating Oil	57316	-	Compliant	Compliant	Compliant	Compliant		Yes
UBRIC	LPS DETEX® FOOD GRADE Chain Lubricant	06016	C06016	Compliant	Not regulated	Not regulated	Compliant		Yes
_	LPS DETEX® FOOD GRADE Machine Oil	01316	C01316	Compliant	Compliant	Compliant	Compliant		Yes
	LPS DETEX® FOOD GRADE Moisture Displacing Spray	53016	-	Compliant	Compliant	Compliant	Compliant		Yes
ELECTRONIC CLEANERS	LPS DETEX® FOOD GRADE Electronic Cleaner	58116	C58116	Compliant	Compliant	Compliant	Compliant		Yes
GREASES	LPS DETEX® FOOD GRADE 3H Spray Grease	54016		MUO*	MUO*	MUO*	MUO*		No
SPECIALTY	LPS DETEX®	06508	C06508	Compliant	Not regulated	Not regulated	Compliant		Yes
SPEC	FOOD GRADE Anti-Seize	06510	C06510	Compliant	Not regulated	Not regulated	Compliant		Yes

*Manufacturing Use Only



LPS 19	Compliant	Yes
LPS 19	Compliant	Yes
Note	Compliant	Yes Yes Yes Yes Yes Yes Yes Yes
10128 1012	Compliant	Yes Yes Yes Yes Yes Yes Yes
Note	Compliant Compliant Compliant Compliant Compliant Compliant Compliant Compliant Compliant	Yes Yes Yes Yes
LPS 2®	Compliant Compliant Compliant Compliant Compliant Compliant Compliant Compliant	Yes Yes Yes Yes
LPS 2° 00222 C00222 Compliant Co	Compliant Compliant Compliant Compliant Compliant Compliant Compliant	Yes Yes Yes
Nagnum	Compliant Compliant Compliant Compliant Compliant Compliant	Yes Yes
Nagnum	Compliant Compliant Compliant Compliant	Yes
Magnum	Compliant Compliant Compliant	
Nagnum	Compliant Compliant	Yes
Note Cooperate Compliant	Compliant	- 103
02028 C02028 Compliant		Yes
02028 C02028 Compliant	Compliant	Yes
02028 C02028 Compliant	Compilant	Yes
02028 C02028 Compliant	Compliant	Yes
02028 C02028 Compliant	Compliant	Yes
02028 C02028 Compliant	Compliant	Yes
02028 C02028 Compliant	Compliant	Yes
02028 C02028 Compliant	Compliant	Yes
KB 88 02316 C02316 Compliant	Compliant	Yes
KB 88 02316 C02316 Compliant Compliant Compliant Compliant 02322 C02322 Compliant Compliant Compliant Compliant	Compliant	Yes
KB 88 02322 C02322 Compliant Complia	Compliant	Yes
02322 C02322 Compliant Compliant Compliant Compliant	Compliant	Yes
ChainMate® 02416 C02416 Compliant Not regulated Not regulated Compliant Not regulated Compliant Not regulated Not regulated Compliant Not regulated Not regu	Compliant	Yes
	Compliant	Yes
02908 C02908 Compliant Not regulated Not regulated Co	Compliant	Yes
Copper Anti-Seize 02910 C02910 Compliant Not regulated Not regulated Co	Compliant	Yes
02916 C02916 Compliant Not regulated Not regulated Co	Compliant	Yes
Nickel Anti-Seize 03908 C03908 Compliant Not regulated Not regulated Compliant Not regulated Not regulated Compliant Not regulated Not reg	Compliant	Yes
03910 C03910 Compliant Not regulated Not regulated Co	Compliant	Yes
All-Purpose Anti-Seize 04108 C04108 Compliant Not regulated Co	Compliant	Yes
O4110 CO4110 Compliant Not regulated Not regulated Co	Compliant	Yes
Electro Contact Cleaner 00416 C00416 Compliant Compliant Compliant Compliant Compliant	Compliant	Yes
Electro 140° 00916 C00916 Compliant Compliant Compliant Compliant Compliant	Compliant	Yes
	n-Compliant 95416 - LPS® MAX CFC Free N	No No
2 CFC Free 03101 C03101 Non-Compliant Not regulated Non-Compliant Non-	n-Compliant	No
O3105 C03105 Non-Compliant Not regulated Non-Compliant Non-	n-Compliant	No
	n-Compliant	No
Revo 66 U4416 CU4416 Compliant Compliant Compliant Compliant Compliant	Compliant	Yes
≈ Micro-X	n-Compliant 06616 - Micro-X NU n-Compliant 06616 - Micro-X NU	
Plastic Safe Electronic Cleaner 04620 C04620 Compliant C	Compliant Coole Micro X No	Yes
	Compliant	Yes
		Yes
		Yes
NoFlash® 2.0 07416 C07416 Compliant	Compliant Compliant	



	PRODUCT			US Part #	CANADA PART #	CA	IL, IN, ME, MA, MI, NJ, OH (until 7/1/23) PA, VA & DC	DE, NH, MD, CT, RI, CO, NY, OH (effective 7/1/23) and UT	CANADA	ALTERNATIVE Product	50 STATE VOC COMPLIANT?
				01005	C01005	MUO*	MUO*	MUO*	MUO*	06305 - T-91™, 04305 - A-151	No
	нох			01020	C01020	MU0*	MUO*	MUO*	MUO*	04416 - REVO 66, 04320 - A-151	No
				01055	C01055	MUO*	MUO*	MUO*	MUO*	06355 - T-91™, 04355 - A-151	No
				01405	C01405	MUO*	MUO*	MUO*	MUO*	06305 - T-91™	No
				01420	C01420	MUO*	MUO*	MUO*	MUO*	06420 - G-49™	No
	PreSolve®			01422	C01422	MUO*	MUO*	MUO*	MU0*	06328 - T-91™	No
				01428	C01428	MUO*	MUO*	MUO*	MUO*	06301 - T-91™	No
				01455	C01455	MUO*	MUO*	MUO*	MUO*	06355 - T-91™	No
	EFX®			01820	C01820	MUO*	MUO*	MUO*	MUO*	05220 - EVR™	No
				01855	C01855	MUO*	MUO*	MUO*	MU0*	05255 - EVR™	No
				02701	C02701	Compliant	Compliant	Compliant	Compliant		Yes
		Conce	entrate	02705	C02701	Compliant	Compliant	Compliant	Compliant		Yes
				02755	C02705	Compliant	Compliant	Compliant	Compliant		Yes
		DTII		02720	C02720	Compliant	Compliant	Compliant	Compliant		Yes
	Precision Clean	RTU		02728 02765	C02728 C02765	Compliant	Compliant	Compliant Compliant	Compliant Compliant		Yes Yes
	orcuii				-	Compliant	Compliant	,	· ·		
		u a	Concentrate	92701 92705	-	Compliant	Compliant	Compliant	Compliant		Yes
		Aviation Grade	Concentrate	92755	-	Compliant Compliant	Compliant Compliant	Compliant Compliant	Compliant Compliant		Yes Yes
		ΨO	RTU	92728	_	Compliant	Compliant	Compliant	Compliant		Yes
			KIU	03505	C03505	MUO*	MUO*	MUO*	MUO*	05205 - EVR™	No
S				03520	C03520	MUO*	MUO*	MUO*	MU0*	05220 - EVR™	No
SER	ZeroTri®			03528	C03528	MUO*	MUO*	MUO*	MUO*	05201 - EVR™	No
ZEA.			03555	C03555	MUO*	MUO*	MUO*	MUO*	05255 - EVR™	No	
INDUSTRIAL DEGREASERS	TriFree			03620	C03620	Non-Compliant	Compliant	Non-Compliant	Non-Compliant	06220 - U-10	No
A L	A-151			04305	C04305	Compliant	Compliant	Compliant	Compliant		Yes
IR				04320	C04320	Compliant	Compliant	Compliant	Compliant		Yes
Sna				04355	C04355	Compliant	Compliant	Compliant	Compliant		Yes
2				04920	C04920	MUO*	MUO*	MUO*	MUO*	06420 - G-49™	No
	F-104°			04955	C04955	MU0*	MUO*	MUO*	MUO*		No
				05205	-	Compliant	Compliant	Compliant	Compliant		Yes
	EVR™			05220	C05220	Compliant	Compliant	Compliant	Compliant		Yes
				05255	C05255	Compliant	Compliant	Compliant	Compliant		Yes
				05501	-	Compliant	Compliant	Compliant	Compliant		Yes
	BFX			05528	C05528	Compliant	Compliant	Compliant	Compliant		Yes
				05555	C05555	Compliant	Compliant	Compliant	Compliant		Yes
				06328	C06328	Compliant	Compliant	Compliant	Compliant		Yes
	T-91™			06301	C06301	Compliant	Compliant	Compliant	Compliant		Yes
				06355	C06355	Compliant	Compliant	Compliant	Compliant		Yes
	G-49™			06420	C06420	Compliant	Compliant	Compliant	Compliant		Yes
	U-10			06220	-	Compliant	Compliant	Compliant	Compliant		Yes
	Instant Super	Degrea	ser 2.0	07220	C07220	MUO*	MUO*	MUO*	MUO*	04416 - REVO 66, 04320 - A-151	No
				07255	C07255	MUO*	MUO*	MUO*	MUO*	04355 - A-151	No
				61400	-	MUO*	MUO*	MUO*	MUO*		No
				61410	-	MUO*	MUO*	MUO*	MUO*		No
				61420	-	MUO*	MUO*	MUO*	MUO*	04320 - A-151	No
	PF® Solvent			61432	-	MUO*	MUO*	MUO*	MUO*		No
				61401	-	MUO*	MUO*	MUO*	MUO*		No
				61405	C61405	MUO*	MUO*	MUO*	MUO*	04305 - A-151	No
				61456	C61456	MUO*	MUO*	MUO*	MUO*	04355 - A-151	No
	PF®-141 IG			62855	-	MU0*	MUO*	MUO*	MUO*	04355 - A-151	No



	PRODUCT		CANADA Part #	CA, CO, CT, DE, MD, NY, RI & UT	IL, IN, ME, MA, MI, NH, NJ, OH, PA, VA, & DC	CANADA	ALTERNATIVE Product	50 STATE VOC COMPLIANT?
ION	Cold Galvanize	05128	C05128	Non-Compliant	Compliant	Compliant	00516 - Cold Galvanize	No
ROSI IBITO		00516	C00516	Compliant	Not regulated	Not regulated		Yes
응볼	BrightCoat Cold Galvanize	05916	C05916	Compliant	Not regulated	Not regulated		Yes

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GREASE	Clear Penetrating Grease	06716	C06716	Compliant	Not regulated	Not regulated	Compliant		Yes
		01205	C01205	Compliant	Not regulated	Not regulated	Compliant		Yes
	Tapmatic® AquaCut	01216	C01216	Compliant	Not regulated	Not regulated	Compliant		Yes
	· · · · ·	01228	C01228	Compliant	Not regulated	Not regulated	Compliant		Yes
	Tonnotice Tricut	05316	C05316	Compliant	Not regulated	Not regulated	Compliant		Yes
	Tapmatic® TriCut	05328	C05328	Compliant	Not regulated	Not regulated	Compliant		Yes
DS	Tapmatic® Dual Action #2	40220	C40220	Compliant	Not regulated	Not regulated	Compliant		Yes
FLUIDS		40230	-	Compliant	Not regulated	Not regulated	Compliant		Yes
	Tapmatic® #1 Gold	40312	C40312	Compliant	Not regulated	Not regulated	Compliant		Yes
CUTTING		40320	C40320	Compliant	Not regulated	Not regulated	Compliant		Yes
F		40330	C40330	Compliant	Not regulated	Not regulated	Compliant		Yes
3		40340	C40340	Compliant	Not regulated	Not regulated	Compliant		Yes
	Tapmatic® Edge Crème	43100	C43100	Compliant	Not regulated	Not regulated	Compliant		Yes
	Tapmatic® Edge Lube	43200	C43200	Compliant	Not regulated	Not regulated	Compliant		Yes
		44220	C44220	Compliant	Not regulated	Not regulated	Compliant		Yes
	Tapmatic® Natural	44230	C44230	Compliant	Not regulated	Not regulated	Compliant		Yes
		44240	C44240	Compliant	Not regulated	Not regulated	Compliant		Yes
SPECIALTY	QB Duster	05710	C05710	Compliant	Not regulated	Not regulated	Compliant		Yes
SPEC	WorkPlace Hand Cleaner Towels	09200	-	Compliant	Compliant	Compliant	Compliant		Yes

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GENERAL EANING WIPE	in-a-Bucket® Hand Cleaner Towels	42201	-	Compliant	Compliant	Compliant	Compliant		Yes
ᄻᅜ		42230	-	Compliant	Compliant	Compliant	Compliant		Yes
HAND PURPOSE		42272	-	Compliant	Compliant	Compliant	Compliant		Yes
S	Hand Sanitizer Wipes	90985	-	Compliant	Compliant	Compliant	Compliant		Yes
w d N	Lemon Hand Sanitizer Wipes	92991	-	Compliant	Compliant	Compliant	Compliant		Yes
SANITIZERS VFECTANTS	SCRUBS® MEDAPHENE® Plus Disinfecting Wipes	96312	-	Compliant	Compliant	Compliant	Compliant		Yes
IIZ IAI		96365	-	Compliant	Compliant	Compliant	Compliant		Yes
AN DE		96390	-	Compliant	Compliant	Compliant	Compliant		Yes
SANITIZERS & DISINFECTANTS WIPES	SCRUBS® NO RINSE Food Surface Disinfectant Wipes	97080	-	Compliant	Compliant	Compliant	Compliant		Yes
SPECIALIZED CLEANERS	Graffiti Wipes	90130	-	Compliant	Compliant	Compliant	Compliant		Yes
	Stainless Steel Cleaner Towels	91930	-	Compliant	Compliant	Compliant	Compliant		Yes
PERSONAL PROTECTION	INSECT SHIELD™ Insect Repellent Wipes	91401	-	Compliant	Compliant	Compliant	Compliant		Yes



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DISINFECTANTS & DEODORIZERS	do-it ALL™ Brand Foaming Germicidal Cleaner		08020		Compliant	Compliant	Compliant	Compliant		Yes
DISINFE & DEODO	DYMON® MEDAPHENE® PLUS Disinfecting Spray		35720	1	Compliant	Compliant	Compliant	Compliant		Yes
SS	Graffiti & Spray Paint Remover		07820	-	Compliant	Compliant	Compliant	Compliant		Yes
EASER	ELIMINATOR™ Carpet Spot Remov	er	10620	-	Compliant	Compliant	Compliant	Compliant		Yes
DEGR	PROBLEM SOLVER Baseboard Cleaner		23920	-	Compliant	Compliant	Compliant	Compliant		Yes
ERS &	All Purpose Foaming Cleaner		19220	-	Compliant	Compliant	Compliant	Compliant		Yes
CLEAN	CLEAR REFLECTION Glass Cleaner	S®	38520	-	Compliant	Compliant	Compliant	Compliant		Yes
GENERAL SURFACE CLEANERS & DEGREASERS	Natural Citrus Oven Cleaner		34420	-	Compliant	Compliant	Compliant	Compliant		Yes
L SUR	Stainless Steel	Oil Based	20920	-	Compliant	Compliant	Compliant	Compliant		Yes
ENERA	Cleaner	Natural Citrus	34520	-	Compliant	Compliant	Compliant	Compliant		Yes
15	Natural Force® Foaming Degreaser		36120	-	Compliant	Compliant	Compliant	Compliant		Yes
	LIQUID ALIVE® Enzyme Producing Bacteria		23301	-	Compliant	Compliant	Compliant	Compliant		Yes
			23305	-	Compliant	Compliant	Compliant	Compliant		Yes
4			23332	-	Compliant	Compliant	Compliant	Compliant		Yes
ONTRO	LIQUID ALIVE® Enzyme Digestant		33420	-	Compliant	Compliant	Compliant	Compliant		Yes
ENZYMES & ODOR CONTROL			33601	-	Compliant	Compliant	Compliant	Compliant		Yes
S & 0	LIQUID ALIVE®		33605	-	Compliant	Compliant	Compliant	Compliant		Yes
IZYME	Odor Digester		33632	-	Compliant	Compliant	Compliant	Compliant		Yes
ā			33655	-	Compliant	Compliant	Compliant	Compliant		Yes
	DRY BREEZE™	Sugar & Spice	70220	-	Compliant	Compliant	Compliant	Compliant		Yes
	Dry Air Freshener	Vanilla	70720	-	Compliant	Compliant	Compliant	Compliant		Yes
INSECTICIDES	THE END.™ Wasp & Hornet Kille	r	18320	-	Compliant	Compliant	Compliant	Compliant		Yes
INSECT	THE END.™ Dry Fog™ Flying Ins	ect Killer	45120	-	Compliant	Compliant	Compliant	Compliant		Yes



