



VOC 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.

California was the first state to adopt these regulations. Since then, other states have followed their lead. The Ozone Transport Commission (OTC) has developed Model Rules for Consumer Products that member states can use a guide to promulgate their own Consumer Product Regulations. The Lake Michigan Air Directors Consortium (LADCO) consists of states that border Lake Michigan and is another group that uses the OTC Model Rules. Over the years, the Consumer Product Regulations have been updated to include more product categories and reduce the VOC limits imposed on existing product categories. These updates, since they take place at the state not federal level, have resulted in a patchwork quilt of regulations. Each state’s rules are similar but not identical. States that have adopted Consumer Product Regulations include: California, Colorado, Connecticut, District of Columbia, Delaware, Indiana, Illinois, Maine, Maryland, Massachusetts, Michigan, New Hampshire, New Jersey, New York, Ohio, Pennsylvania, Rhode Island, Utah and Virginia. It is worth mentioning that a federal Consumer Products Regulation does exist. However, it has been virtually obsoleted by the more stringent state regulations.

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 DOES “CHLORINATED SOLVENT RESTRICTION” MEAN?

Certain states are restricting the use of methylene chloride, perchloroethylene, and trichloroethylene in select product categories. LPS products are not affected by this restriction.

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 LPS OFFER AS A SOLUTION?

LPS 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 the LPS VOC Guide (http://www.lpslabs.com/site_files/literature/LPS_VOC_Guide.pdf) to assist our customers in determining the compliance status of regulated products as well as a complete listing of our 50 State Compliant items (http://www.lpslabs.com/site_files/literature/VOC_CompliantProducts.pdf).

CONSUMER PRODUCT REGULATION - 2018 UPDATE

OTC and LADCO STATES	STATUS
New Jersey	Implemented the 2006 OTC rule, with chlorinated solvent restrictions including automotive parts, effective 1/1/09.
Maine, Massachusetts and Michigan	Implemented the 2006 OTC rule, with chlorinated solvent restrictions, effective 1/1/09.
Ohio, Pennsylvania	Implemented the 2006 OTC rule, without chlorinated solvent restrictions, effective 1/1/09.
Delaware, New Hampshire, Maryland, Connecticut, Rhode Island, and Colorado	Implemented the 2014 OTC rule. Limits went into effect 1/1/15, 1/1/17, 1/1/18, 5/1/18, 1/1/20, and 5/1/20.
Indiana	Implemented the 2006 OTC rule, with chlorinated solvent restrictions, effective 6/1/11.
Vermont, Wisconsin	No plan to adopt any consumer product regulations.
Illinois	Implemented the 2006 OTC Rule, with chlorinated solvent restrictions effective 7/1/12.
New York	Implemented the 2006 OTC rule, with chlorinated solvent restrictions, effective 1/1/10.
Virginia (<i>Northern VA, Fredericksburg and Richmond VOC Emission Control Areas</i>)	Implemented the 2006 OTC rule, with chlorinated solvent restrictions, effective 8/1/10.
Washington, DC	Implemented the 2006 OTC rule, with chlorinated solvent restrictions, effective 1/1/12.
Utah (<i>Box Elder, Cache, Davis, Salt Lake, Tooele, Utah, Webber Counties</i>)	Implemented regulation based on 2014 OTC Mode Rule with an effective date of 9/1/14.

The following spreadsheet discusses the compliance status of affected LPS 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 SCAQMD rules, affect LPS products, please contact our Technical Department at 800-241-8334.

Products listed as “Not for retail sale - for 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

Not For Retail Sale: Product can be sold to manufacturers but not to the general public

LUBRICANTS/PENETRANTS								
Product	Part #	California	New Jersey	Illinois, Indiana, Maine, Massachusetts, Michigan, New York, Virginia, Washington DC	Ohio, Pennsylvania	Connecticut, Delaware, Maryland, New Hampshire, Rhode Island, Colorado**	Utah	Alternative Product
LPS 1*	00105	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
	00116	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
	00122	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
	00155	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
	01128	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
LPS 2*	00205	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
	00216	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
	00222	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
	00255	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
	02128	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
Magnum	00605	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
	00616	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
Heavy-Duty Silicone	01505	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
	01516	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
	51516	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
Dry Film Silicone	01616	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
LST	01916	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
	01955	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
TKX*	02005	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
	02016	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
	02022	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
	02028	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
	02055	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
KB 88	02316	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
	02322	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
ChainMate*	02416	Compliant	Not regulated	Not regulated	Not regulated	Not regulated	Not regulated	
Copper Anti-Seize	02908	Compliant	Not regulated	Not regulated	Not regulated	Not regulated	Not regulated	
	02910	Compliant	Not regulated	Not regulated	Not regulated	Not regulated	Not regulated	
	02916	Compliant	Not regulated	Not regulated	Not regulated	Not regulated	Not regulated	
Nickel Anti-Seize	03908	Compliant	Not regulated	Not regulated	Not regulated	Not regulated	Not regulated	
	03910	Compliant	Not regulated	Not regulated	Not regulated	Not regulated	Not regulated	
All-Purpose Anti-Seize	04108	Compliant	Not regulated	Not regulated	Not regulated	Not regulated	Not regulated	
	04110	Compliant	Not regulated	Not regulated	Not regulated	Not regulated	Not regulated	
Food Grade Chain Lubricant	06016	Compliant	Not regulated	Not regulated	Not regulated	Not regulated	Not regulated	
Food Grade Anti-Seize	06508	Compliant	Not regulated	Not regulated	Not regulated	Not regulated	Not regulated	
	06510	Compliant	Not regulated	Not regulated	Not regulated	Not regulated	Not regulated	

INDUSTRIAL DEGREASERS

Product	Part #	California	New Jersey	Illinois, Indiana, Maine, Massachusetts, Michigan, New York, Virginia, Washington DC	Ohio, Pennsylvania	Connecticut, Delaware, Maryland, New Hampshire, Rhode Island, Colorado**	Utah	Alternative Product
Instant Super Degreaser	00720	*	*	*	*	*	*	04016 - NoFlash®, 04416 - Revo 66, 04320 - A-151
HDX	01005	*	*	*	*	*	*	06305 - T-91™, 04305 - A-151
	01020	*	*	*	*	*	*	04016 - NoFlash®, 04416 - Revo 66, 04320 - A-151
	01055	*	*	*	*	*	*	06355 - T-91™, 04355 - A-151
Presolve®	01405	*	*	*	*	*	*	06305 - T-91™
	01420	*	*	*	*	*	*	06420 - G-49™
	01422	*	*	*	*	*	*	06328 - T-91™
	01428	*	*	*	*	*	*	06301 - T-91™
EFX®	01455	*	*	*	*	*	*	06355 - T-91™
	01820	*	*	*	*	*	*	05220 - EVR™
Precision Clean	Concentrate	01805	*	*	*	*	*	05255 - EVR™
		02701	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant
		02705	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant
	RTU	02755	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant
		02720	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant
		02728	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant
	Aviation - RTU	02765	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant
		92728	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant
	Aviation - Concentrate	92701	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant
92705		Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
ZeroTri®	92755	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
	03505	*	*	*	*	*	*	05205 - EVR™
	03520	*	*	*	*	*	*	05220 - EVR™
	03528	*	*	*	*	*	*	05201 - EVR™
TriFree	03555	*	*	*	*	*	*	05255 - EVR™
	03620	Non-Compliant	Compliant	Compliant	Compliant	Non-Compliant	Non-Compliant	06220 - U-10
A-151	04305	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
	04320	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
	04355	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
F-104°	04920	*	*	*	*	*	*	06420 - G-49™
	04955	*	*	*	*	*	*	
EVR™	05205	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
	05220	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
	05255	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
BFX	05501	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
	05528	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
	05555	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
T-91™	06328	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
	06301	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
	06355	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
G-49™	06420	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	

*Not for retail sale - for manufacturing use only • **Effective 5/1/20

INDUSTRIAL DEGREASERS

Product	Part #	California	New Jersey	Illinois, Indiana, Maine, Massachusetts, Michigan, New York, Virginia, Washington DC	Ohio, Pennsylvania	Connecticut, Delaware, Maryland, New Hampshire, Rhode Island, Colorado**	Utah	Alternative Product
U-10 Brake Cleaner	06220	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
Instant Super Degreaser 2.0	07220	*	*	*	*	*	*	04016 - NoFlash®, 04416 - Revo 66, 04320 - A-151
	07255	*	*	*	*	*	*	04355 - A-151
PF® Solvent	61400	*	*	*	*	*	*	
	61410	*	*	*	*	*	*	
	61420	*	*	*	*	*	*	04320 - A-151
	61432	*	*	*	*	*	*	
	61401	*	*	*	*	*	*	
	61405	*	*	*	*	*	*	04305 - A-151
	61456	*	*	*	*	*	*	04355 - A-151

ELECTRONIC CLEANERS

Product	Part #	California	New Jersey	Illinois, Indiana, Maine, Massachusetts, Michigan, New York, Virginia, Washington DC	Ohio, Pennsylvania	Connecticut, Delaware, Maryland, New Hampshire, Rhode Island, Colorado**	Utah	Alternative Product
PF®-141 IG	62855	*	*	*	*	*	*	04355 - A-151
Electro Contact Cleaner	00416	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
Electra-X	00816	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
Electro 140°	00916	Non-Compliant	Non-Compliant	Non-Compliant	Non-Compliant	Non-Compliant	Non-Compliant	04320 - A-151
CFC Free	03116	Non-Compliant	Non-Compliant	Non-Compliant	Non-Compliant	Non-Compliant	Non-Compliant	05416 - CFC Free NU
	03101	Non-Compliant	Not regulated	Not regulated	Not regulated	Non-Compliant	Non-Compliant	
	03105	Non-Compliant	Not regulated	Not regulated	Not regulated	Non-Compliant	Non-Compliant	
	03155	Non-Compliant	Not regulated	Not regulated	Not regulated	Non-Compliant	Non-Compliant	
NoFlash®	04016	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
Revo 66	04416	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
Micro-X	04516	Non-Compliant	Non-Compliant	Non-Compliant	Non-Compliant	Non-Compliant	Non-Compliant	06616 - Micro-X NU
	04555	Non-Compliant	Not regulated	Not regulated	Not regulated	Non-Compliant	Non-Compliant	06616 - Micro-X NU
Plastic Safe Electronic Cleaner	04620	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
CFC Free NU	05416	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
Micro-X NU	06616	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
Electra-X 2.0	07316	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
NoFlash® 2.0	07416	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	
Food Grade Electronic Cleaner	58116	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	

CORROSION INHIBITORS

Product	Part #	California, Colorado**, Connecticut, Delaware, Maryland, Rhode Island	New Jersey	Illinois, Indiana, Maine, Massachusetts, Michigan, New York, Virginia, Washington DC	Ohio, Pennsylvania	New Hampshire	Utah	Alternative Product
Cold Galvanize	05128	Non-Compliant	Compliant	Compliant	Compliant	Compliant	Not regulated	00516 - Cold Galvanize
	00516	Compliant	Not regulated	Not regulated	Not regulated	Not regulated	Not regulated	
BrightCoat Cold Galvanize	05916	Compliant	Not regulated	Not regulated	Not regulated	Not regulated	Not regulated	

GREASE

Product	Part #	California	New Jersey	Illinois, Indiana, Maine, Massachusetts, Michigan, New York, Virginia, Washington DC	Ohio, Pennsylvania	Connecticut, Delaware, Maryland, New Hampshire	Utah	Alternative Product
Clear Penetrating Grease	06716	Compliant	Not regulated	Not regulated	Not regulated	Not regulated	Not regulated	

CUTTING FLUIDS

Product	Part #	California	New Jersey	Illinois, Indiana, Maine, Massachusetts, Michigan, New York, Virginia, Washington DC	Ohio, Pennsylvania	Connecticut, Delaware, Maryland, New Hampshire, Rhode Island, Colorado**	Utah	Alternative Product
Tapmatic® AquaCut	01205	Compliant	Not regulated	Not regulated	Not regulated	Not regulated	Not regulated	
	01216	Compliant	Not regulated	Not regulated	Not regulated	Not regulated	Not regulated	
	01228	Compliant	Not regulated	Not regulated	Not regulated	Not regulated	Not regulated	
Tapmatic® TriCut	05316	Compliant	Not regulated	Not regulated	Not regulated	Not regulated	Not regulated	
	05328	Compliant	Not regulated	Not regulated	Not regulated	Not regulated	Not regulated	
Tapmatic® Dual Action #2	40220	Compliant	Not regulated	Not regulated	Not regulated	Not regulated	Not regulated	
	40230	Compliant	Not regulated	Not regulated	Not regulated	Not regulated	Not regulated	
Tapmatic® #1 Gold	40312	Compliant	Not regulated	Not regulated	Not regulated	Not regulated	Not regulated	
	40320	Compliant	Not regulated	Not regulated	Not regulated	Not regulated	Not regulated	
	40330	Compliant	Not regulated	Not regulated	Not regulated	Not regulated	Not regulated	
	40340	Compliant	Not regulated	Not regulated	Not regulated	Not regulated	Not regulated	
Tapmatic® Edge Crème	43100	Compliant	Not regulated	Not regulated	Not regulated	Not regulated	Not regulated	
Tapmatic® Edge Lube	43200	Compliant	Not regulated	Not regulated	Not regulated	Not regulated	Not regulated	
Tapmatic® Natural	44220	Compliant	Not regulated	Not regulated	Not regulated	Not regulated	Not regulated	
	44230	Compliant	Not regulated	Not regulated	Not regulated	Not regulated	Not regulated	
	44240	Compliant	Not regulated	Not regulated	Not regulated	Not regulated	Not regulated	

SPECIALTY MRO PRODUCTS

Product	Part #	California	New Jersey	Illinois, Indiana, Maine, Massachusetts, Michigan, New York, Virginia, Washington DC	Ohio, Pennsylvania	Connecticut, Delaware, Maryland, New Hampshire, Rhode Island, Colorado**	Utah	Alternative Product
QB Duster	05710	Non-Compliant	Not regulated	Not regulated	Not regulated	Not regulated	Not regulated	
WorkPlace Hand Cleaner Towels	09200	Compliant	Compliant	Compliant	Compliant	Compliant	Compliant	

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