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National Volatile Organic Compound Emission Standards for Consumer Products

The California Air Resources Board (CARB) defines low vapor pressure volatile organic compounds (LVP-VOC) in the Regulation for Reducing Emissions from Consumer Products (title 17, California Code of Regulations, section 94508). For the purposes of the definition of LVP-VOC, chemical "compound" means a molecule of definite chemical formula and isomeric structure, and chemical "mixture" means a substance comprised of two or more chemical "compounds." "LVP-VOC" means a chemical "compound" or "mixture" that contains at least one carbon atom and meets one of the following:

- (A) has a vapor pressure less than 0.1 mm Hg at 20°C, as determined by CARB Method 310; or
- (B) is a chemical "compound" with more than 12 carbon atoms, or a chemical "mixture" comprised solely of "compounds" with more than 12 carbon atoms, as verified by formulation data, and the vapor pressure and boiling point are unknown; or
- (C) is a chemical "compound" with a boiling point greater than 216°C, as determined by CARB Method 310; or
- (D) is the weight percent of a chemical "mixture" that boils above 216°C, as determined by CARB Method 310.

LVP-VOCs used in consumer products are not counted towards the total product VOC content for compliance purposes.

then, for CONSUMER PRODUCTS APPLICATIONS ONLY they are not required to be reported as VOC's. Please be aware that some of the players in the market are stating that their products are "VOC Exempt", per my discussions with the EPA, this terminology is legally incorrect. You must state that you are exempt for Consumer Goods applications.

The products in our line that comply with these requirements are as follows:

Calumet 422 <1%
Conosol 200
Conosol 260
Conosol 340
Drakesol 205
Drakesol 220
Drakesol 260
Magiesol 44
Magiesol 47
Magiesol 52
Magiesol 60

Please share this letter with any customers who may have questions regarding this topic.

Please contact Calumet's Product Support Team at <u>technical@clmt.com</u> should you have further questions.

Regards,

Lynn Massad Technical Market Development Manager