



## Standards for Consumer and Commercial Products (CCP) Rule VOC Rule 326 IAC 8-15

Office of Air Quality

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**Background:**

- Manufacturers, suppliers and sellers of consumer and commercial products (CCP) need to be aware of volatile organic compound (VOC) content limits, container labeling and record keeping requirements in Indiana's VOC rule for CCP.
  - CCP are defined as chemically formulated products used by households and institutional consumers including, but not limited to, detergents; cleaning compounds; polishes; floor finishes; personal care products; disinfectants; sanitizers; aerosol paints; and automotive specialty products. The product types listed in this definition are only examples—not a comprehensive list.
- This rule became effective on November 1, 2010, and applies to all consumer and commercial products manufactured after June 1, 2011.
- You are subject to this rule if you supply, sell, offer for sale, or manufacture any consumer and commercial products that contain VOCs for use within the state of Indiana.
- This rule is found in the Indiana Administrative Code under 326 IAC 8-15. It is available on the Indiana Legislative Services website at [www.IN.gov/legislative/iac/T03260/A00080.PDF](http://www.IN.gov/legislative/iac/T03260/A00080.PDF).

**Environmental Impacts:**

- Solvents in CCPs can evaporate, releasing VOCs into the air. Those VOCs contribute to the formation of ground-level ozone pollution. Ground-level ozone pollution can cause health problems and damage to some crops. The United States Environmental Protection Agency (U.S. EPA) sets health-based standards for ozone in the air we breathe.
- The VOC rule for consumer and commercial products is part of a regional effort by the Lake Michigan Air Directors Consortium (LADCO) area states to reduce VOC emissions and meet U.S. EPA health-based standards for ozone in the upper Midwest and Eastern United States.

**IDEM Role:**

- The Indiana Department of Environmental Management (IDEM) is responsible for protecting human health and the environment while providing for safe industrial, agricultural, commercial, and governmental operations vital to a prosperous economy. IDEM issues permits, conducts inspections, provides technical assistance, and enforces regulations.

**Manufacturer, Supplier and Seller Roles:****VOC Content Limit Standards**

- Whether you are a manufacturer, supplier, or seller, make sure the consumer and commercial product complies with the rule's VOC content limits found in 326 IAC 8-15-3(a).
- To determine the category for the CCP you manufacture or sell, review the definitions of each product category provided in 326 IAC 8-15-2. If more than one category definition fits your product, then you must comply with the most restrictive VOC content limit.
- CCPs for which the label, packaging, or accompanying literature specifically states that the product should be diluted with water or non-VOC solvent prior to use, the VOC content limits specified shall apply to the product only after the minimum recommended dilution has occurred.
- CCPs for which the label, packaging, or accompanying literature specifically states that the product should be diluted with a VOC solvent prior to use, the VOC content limits specified shall apply to the product only after the maximum recommended dilution has taken place.

- All manufacturers should determine the VOC content of the product by using the methods provided in 326 IAC 8-15-9. You may use either California Air Resources Board (CARB) method 310, or an alternative method shown to accurately determine the concentration of VOCs in a product. The alternative method must first be approved, in writing, by IDEM and U.S. EPA. Compliance can be demonstrated through calculation of the VOC content using consumer product records as described in 326 IAC 8-15-9. However, if your results of an alternative method differ from the results of a CARB method 310, the CARB method 310 results will govern.

#### **Labeling and Record Keeping Requirements:**

- For products manufactured beginning June 1, 2011, each manufacturer of a CCP shall clearly display on the product container or package the date (day, month, and year) that the product was manufactured or a code indicating the date as required in 326 IAC 8-15-7.
- The date or date code information must be located on the container or inside the cover or cap so it is readily observable without disassembling the container or packaging.
- Each manufacturer of a product subject to a VOC content limit in 326 IAC 8-15-3 may be asked by IDEM to report certain information as described in 326 IAC 8-15-8 within 90 days of the request.
- Manufacturers of a CCP that contains perchloroethylene or methylene chloride have additional record keeping requirements under 326 IAC 8-15-8(c).

#### **Exemptions**

- Following are some exemptions (*refer to the rule for exemptions that might apply to you*):
- A product manufactured in Indiana for shipment and use outside of Indiana, as described in 326 IAC 8-15-4.
- Other compounds as described in 326 IAC 8-15-4, including low vapor pressure - volatile organic compounds (LVP-VOC); bait station insecticides; some air fresheners; some insecticides; adhesives sold in containers of a fluid ounce or less; some deodorants and antiperspirants and certain fragrances and colorants added to these products.
- Products that are incorporated into or used exclusively in the manufacture or construction of goods or commodities at the site of the establishment are not considered consumer products and are not subject to this regulation as described in the definition of institutional products in 326 IAC 8-15-2. Examples include such items as mold-release products and non-aerosol adhesives used in the manufacturing of goods or commodities. Products that may be used at a manufacturing facility that are consumer products subject to this rule include products that are used in general cleaning or maintenance of the manufacturing facility.
- Innovative products, defined as products which are not in compliance with an applicable VOC content limit, but due to some characteristic of the product formulation, the use of that product will result in less VOC emissions than another representative product that complies with the limit. See 326 IAC 8-15-5 of the rule for specific guidance.