



ADVISORY NOTICE

Rule 1113

Original Review: January 2010

Revised Date: April 2012

Subject: Clarification of Zero-VOC Product Labeling

Issue:

The South Coast Air Quality Management District has been made aware of an inquiry regarding manufacturer product labeling practices and claims of 'zero'-VOC.

Analysis:

AQMD staff does not encourage coating manufacturers to label or market products as zero-VOC, unless the manufacturer can demonstrate that all of the components in the coatings, including any additives, do not contain any VOCs. The AQMD regulates the labeling of specific rule requirements including, but not limited to, the batch code or date a product was manufactured, product categorization, and VOC content.

AQMD Chemists assert that trace amounts of VOC's are found in all coatings using the Gas Chromatography - Mass Spectrometry (GC-MS) detection method. Given that trace levels of VOCs can be found in virtually all liquid coatings, and that, to date, AQMD has not tested an architectural coating that does not contain trace levels of VOCs, AQMD does not use the term 'zero-VOCs.' In the coatings industry, while the term 'zero-VOCs' is sometimes used to describe architectural coatings containing trace amounts of VOCs, a uniform standard for the term has not yet been established.

Conclusion:

The AQMD uses the term Super-Compliant Coatings, defined as coatings that have a VOC content less than 10 g/L VOC.

Comments or questions regarding Rule 1113 should be directed to areasources@aqmd.gov or call the Area Source team at 909-396-2390.