

Aerosol Coatings/VOC Emission Standards: U.S. Environmental Protection Agency to Initiate Rulemaking



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The United States Environmental Protection Agency (“EPA”) stated that it will initiate rulemaking in 2021 to amend the national volatile organic compound (“VOC”) emission standards for the Aerosol Coatings category under Section 183(e) of the Clean Air Act.

The term aerosol coatings in this context refers to aerosol spray paints.

The American Coatings Association (“ACA”) noted in a June 29th article that EPA has indicated a final rule is expected by the end of the year.

The ACA has previously asked EPA to amend the rule for aerosol coatings to:

- Update the table for Maximum Incremental Reactivity values to align with California’s aerosol coatings rule
- Adjust the default value
- Add compounds to the rule’s Table 2A

ACA notes that it previously submitted two petitions for rulemaking addressing these issues in 2017.

The Clean Air Act requires that EPA control VOC emissions from specific categories of consumer and commercial products. Such controls are intended to reduce emissions contributing to ozone formation and ozone nonattainment.

The National Volatile Organic Compound Emission Standards for Aerosol Coatings was promulgated on March 24, 2008. It established VOC reactivity-based emission limits.

EPA states that the proposed amendments will:

. . . update the coating category product-weighted reactivity emission limits, add compounds and corresponding reactivity factors, and amend reporting requirements.

The sectors affected by such rulemaking would include:

- 325510 Paint and coating manufacturing
- 325998 All other miscellaneous chemical product and preparation manufacturing

A link to the EPA document discussing the intent to initiate rulemaking can be found [here](#).