

## Is the consumer product that my company manufactures subject to the new Consumer Products Rule?

The Michigan Consumer Products Rule (CPR), [Rules 660 and 661](#) of the Michigan Air Pollution Control Rules requires manufacturers to reduce the amount of volatile organic compounds (VOCs) in certain products used in households and institutions. The CPR prohibits the distribution, sale or offering for sale of consumer products manufactured on or after January 29, 2007, whose volatile organic compound (VOC) content exceeds specific thresholds identified in the CPR. Those consumer products range from deodorants to aerosol paints. The reduction of VOCs in consumer products will be done through product reformulation.

The Michigan CPR adopts the September 2006 [Ozone Transport Commission's](#) (OTC's) "[Model Rule for Consumer Products](#)," (OTC Rule) with just a few exceptions (go to [www.otcair.org](http://www.otcair.org) and select "Stationary/Area Sources" from the TOPIC drop down menu. On page 2, scroll down to the heading, "Projects," and click on "OTC Model Rule for 2009 Implementation").

"Consumer products" are defined as chemically formulated products used by households and institutions including, but not limited to, detergents; cleaning compounds; polishes; floor finishes; cosmetics; personal care products; home, lawn and garden products; disinfectants; sanitizers; aerosol paints; and automotive specialty products. The product types listed in this definition are just examples; it is not an exhaustive list. The definitions for "consumer," "consumer product," "household product," "institutional product," and many of the other terms are defined in Section 2, page 1, of the [OTC Rule](#).

If your consumer product contains volatile organic compounds (VOCs), it may be subject to the Michigan Consumer Products Rule (CPR). A VOC is any compound that contains carbon and participates in atmospheric (smog forming) reactions. Refer to [Rule 661](#) for a listing of the compounds excluded from the definition of VOC. Products might be formulated with VOCs, or might contain fragrance, color additives, blowing agents, or propellants that contain VOCs. Manufacturers provide the VOC content of their products on Material Safety Data Sheets and Certified Product Data Sheets. These sheets may be provided with shipping documents or may be available from the manufacture upon request. Many consumer products have the VOC content information printed on the product label.

Once you have determined that your consumer product contains VOCs, then you must understand the VOC content limit of your product to determine if you are subject to the CPR. The VOC content limit is based on the percent VOC by weight of the product. The VOC content limits for consumer products are listed in the Table of Standards found in Section 3, page 20, of the OTC Rule. The definitions of these product categories are very specific. It is not always easy to tell if a product is one of these just by looking at the name of the category. Please refer to the [Frequently Asked Questions: Consumer Products Rule](#), page 4, for assistance in determining if the product category applies to your consumer product (go to [www.michigan.gov/deq](http://www.michigan.gov/deq), click on "DEQ Publications" under the far right column heading DEQ Quick Links, and then search by Keyword: consumer product).

For further information regarding the [Michigan CPR](#), visit [www.michigan.gov/deqair](http://www.michigan.gov/deqair), select "Laws and Rules" and scroll down to "Consumer Product Rules." If you have any questions, please contact the [Environmental Assistance Program](#) at 1-800-662-9278 or e-mail [deq-ead-env-assist@michigan.gov](mailto:deq-ead-env-assist@michigan.gov).