

National Aerosol Association

**2012 NCWM Interim Meeting
January 23, 2012**

Objectives

- To provide information to Weights and Measures on Bag on Valve (BOV) Technology
- To contest any change to the Weight Declaration for aerosols

Aerosols

- Definition:

- Merriam Webster

- Noun: a substance (such as hair spray or medicine) that is kept in a container under pressure and that is released as a fine spray when a button is pressed.

- Dictionary.com

- Noun: a liquid substance, as a disinfectant or deodorant, sealed in a metal container under pressure with an inert gas or other activating agent and released as a spray or foam through a push-button valve or nozzle: an aerosol for cleaning ovens.
- Adjective: of or containing a liquid or gas under pressure for dispensing as a spray or foam:

Aerosol Forms

- **Consists of many forms**

- Aerosols using liquified gases
- Aerosols using compressed gases
- Aerosols in barrier forms including Sepro, Bladder, Bag on Valve etc.

Aerosol Forms

- Barrier types are not new
- Have been around the Industry for 20 plus years
- Used in many product forms

Barrier Packs

- Typically used where compatibility issues exist
 - High Ph., Low Ph., Viscosity issues (shaving cream), stability issues
 - Environmental/Flammability issues

Barrier Packs

- Are Pressurized Packages
- Appear the same as compressed gas or liquefied propellant products
- Have been treated same by Consumer Product Regulations

Barrier Packs

- Historically considered aerosols by numerous agencies.
 - Title 49
 - United Nations
 - IM-DG
 - California Air Resources Board

Issues Raised by Blue Magic

- Flammability
- VOC Issues
- Active Ingredients

Flammability

- BOV products can be as flammable or more flammable than other aerosols depending on the formula

VOC Issues

- Referenced in Blue Magic's letter were propellants, propane, butane and isobutane in discussion of VOC
- These are not the only compounds in aerosols that are VOC's
- **HOWEVER**, these propellants have the lowest reactivity of all VOC compounds
- Ironically the Terpenes used in the Pure Citrus are significantly more reactive

Hydrocarbon vs. Terpene Reactivity

	Reactivity	
Propane	0.49	MIR
Butane	1.15	MIR
Isobutane	1.23	MIR
Terpenes	4.04	MIR

- Terpenes are 8X more reactive than propane
- Terpenes are 3X more reactive than butanes

Active Ingredient

- Not Defined
- Aerosols are a delivery system
- Judged on Efficacy
 - Lubricants
 - Spray Paints
 - Surface Cleaners
 - Etc.

Active Ingredient

- Blue Magic examples are misleading
- For example in a lubricant a significant portion of the ingredients in sum total are all useful ingredients

“Active” Ingredient

- Vary from product category to category

Expelling Product

- Both BOV and non BOV products are designed to expel their products equally.

Suggested Resolutions

1). Listing a BOV as a non-aerosol is extremely misleading. The product is pressurized and stating non-aerosol may imply that the product is not under pressure which is a safety concern.

Suggested Resolution

2). Again having two similar looking products on the shelf and labeling one with volume and the other with net weight is extremely confusing to the consumer, especially when both products are pressurized products.

Summary

- BOV Technology is not new
- BOV are pressurized products (aerosols)
- BOV Technology is not necessarily more green than other aerosols
- Many Agencies already have long standing definitions and regulations that define BOV as aerosols
- Changing the NIST will confuse manufacturers and consumers alike. Not lead to “misinformation” or “misleading” advertising
- Many of the current standards (VOC) regulations were written with BOV considered as aerosols

Conclusion

- Any change to the NIST definition for labeling will place the Weights and Measures definition of an aerosol at odds with numerous other agency definitions
- Confusion will arise with consumers if two identical containers are labeled differently

Thank You!