

Applying Traffic Marking Coatings?

New Federal Regulatory Requirements for Users of Traffic Marking Coatings: VOC Concentration Limits and Seasonal Use Restriction

Volatile Organic Compound (VOC) Concentration Limits for Architectural Coatings Regulations

As a company, government or facility that uses traffic marking (TM) coatings as part of your operations, or specifies such activities during contractual arrangements, you need to be aware of Regulations now specifying the **VOC concentration limits of TM coatings**. Starting September 10, 2012, these regulations will mandate a seasonal restriction **on the use of TM coatings**.

Please share this information with your subcontractors, operations and equipment asset managers, as switching to alternative marking products and lower VOC concentration coating products may require changes in application equipment and techniques from current practice. For example: water-based paints require corrosion-proof equipment; epoxy paints need separate tanks for the two reacting agents, plus mixing equipment; and tape markings require completely different application equipment, as do other durable traffic marking products.

The Government of Canada is working to protect the environment and health of Canadians from the effects of air pollutants that increase the risk of respiratory and heart diseases. As part of this work, in 2009 Environment Canada adopted the *Volatile Organic Compound (VOC) Concentration Limits for Architectural Coatings Regulations*, which include regulatory requirements affecting TM coatings. VOCs are released to the atmosphere by evaporation following application of both solvent-based and water-based coatings. They react through photochemical processes in sunlight, and contribute to the formation of ground-level ozone, one of the main ingredients of smog.

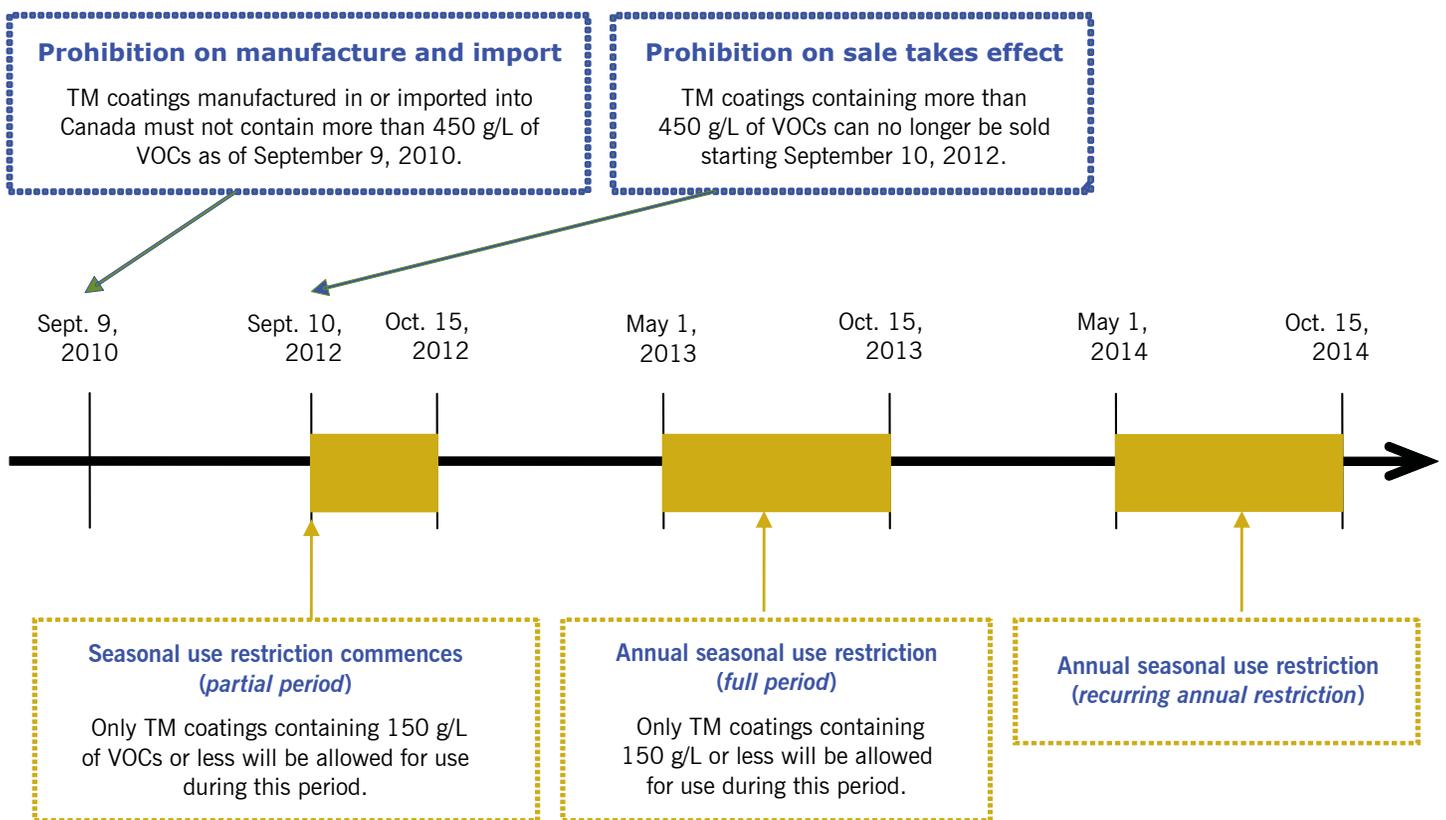
New Regulatory Requirements Setting VOC Concentration Limits for Traffic Marking Coatings

The Regulations have set a VOC limit of 450 g/L, as the highest concentration of VOCs permitted in TM coating products:

- since September 9, 2010, TM coatings either manufactured in Canada, or imported into Canada, must not contain more than 450 g/L of VOCs; and
- as of September 10, 2012, it will be prohibited to sell, or offer for sale, any TM coating containing more than 450 g/L of VOCs.

The two-year implementation period minimizes wastage of product by allowing the sell-through of the inventory already manufactured or imported until September 9, 2010.





Note: While the Regulations do not prescribe the VOC concentration for TM coatings used outside of May 1 to October 15, there is now a VOC concentration limit of 450 g/L for TM coatings manufactured in and imported into Canada. All TM coatings that do not meet this limit can no longer be sold as of September 10, 2012.

Seasonal Use Restriction for High VOC Content TM Coatings

Starting September 10, 2012, there will be an annual seasonal prohibition, over the period of May 1 to October 15 inclusive, on the use of TM coatings containing more than 150 g/L of VOCs.

These specific seasonal requirements were developed in response to concerns expressed by TM stakeholders regarding the performance and cost of low-VOC TM coatings for cold weather application. There are no exceptions to this seasonal use restriction.

The diagram above illustrates the effective dates for the regulatory requirements and the seasonal use restriction period.

Labelling Requirements that Apply to TM Coatings

TM coatings manufactured or imported since September 10, 2010, and containing between 150 g/L and 450 g/L of VOCs are now required to have the following text printed on the label or lid:

"Not for application for the period beginning on May 1 and ending on Oct. 15"

As of September 10, 2012, this statement will be required on all containers of TM coatings being offered for sale containing greater than 150 g/L of VOCs.

Other new labelling requirements of the Regulations that will apply to TM coatings include:

- the manufacturing date (or date code) to be printed on container lid/bottom or label; and
- instructions or a statement indicating whether dilution of the product is or is not required.

Suggested Methods for Tracking and Keeping Records on Seasonal Usage of TM Coatings

The Regulations do not specify how TM coating users are to record compliance with the seasonal use restriction preferring instead for individual operations to develop their own tracking systems, which will fit in with their current operational practices and record keeping.

Options for tracking seasonal use compliance include but are not limited to the following activities:

- linking job orders and/or contractual documents to inventory, store supply records, purchase orders or use of alternative TM products;
- including the seasonal use TM coating requirements within worker orientation and ongoing training programs, contract documentation and operational procedures; and
- tracking equipment usage, maintenance programs and records, and equipment rental contracts.

Please note that these are suggestions and it remains the TM coating users' responsibility to demonstrate regulatory compliance with the seasonal use restriction.

HOW TO STAY INFORMED?

For additional information, visit www.ec.gc.ca/cov-voc

Questions and inquiries can be directed to Environment Canada:

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