



December 22, 2009

RE: COMPLIANCE REQUIREMENTS FOR SECTION 4.5 OF GS-11, 2008: COLORANT ADDED AT THE POINT-OF-SALE VOC CONTENT LIMIT

Green Seal's GS-11 Environmental Standard for Paints and Coatings, Second Edition May 12, 2008 included an implementation date of January 1, 2010 for Section 4.5 pertaining to Colorants Added at the Point-of-Sale VOC Content Limit.

4.5 Effective as of January 1, 2010, Colorant Added at the Point-of-Sale VOC Content Limit. The VOC concentration of the product including the colorant added at the point-of-sale shall not exceed those listed below in grams of VOC per liter of product as determined by the methods listed in Section 4.4. Green Seal will apply an average VOC level calculation unless a manufacturer can provide documentation of the colorant(s) VOC levels and specifies that only those colorant(s) tested shall be used with the product.

Product Type	VOC level (in g/L)
Flat Topcoat with colorant added at the point-of-sale	100
Non-Flat Topcoat with colorant added at the point-of-sale	150
Primer or Undercoat with colorant added at the point-of-sale	150
Floor Paint with colorant added at the point-of-sale	150
Anti Corrosive Coating with colorant added at the point-of-sale	300
Reflective Wall Coating with colorant added at the point-of-sale	100
Reflective Roof Coating with colorant added at the point-of-sale	150

Keep in mind that **Section 4.4 VOC Content Limit will continue to be in effect for the base paint product**, but in order to meet the requirements of the 4.5 Colorants Added at the Point-of-Sale VOC Content Limit requirement, certified products, any products currently undergoing review for certification, and any new applications **must also meet Section 4.5 Colorants Added at the Point-of-Sale VOC Content Limit as of January 1, 2010.**

In order to demonstrate your product(s) comply with the Colorants Added at the Point-of-Sale VOC Content Limit, you must provide documentation to demonstrate that your product complies with the VOC Content limits with colorants added at the point-of-sale. If your product is not intended to be used with colorants added at the point-of-sale, then you should submit a signed letter on company letterhead that your product(s) is not intended and will not be used with colorants added at the point-of-sale. You should submit the letter to Green Seal by the deadline listed below.

If your product is intended to be used with colorants added at the point-of-sale, you must provide documentation to demonstrate that your products comply with the VOC Content Limit requirements for colorants added at the point-of-sale.

Suggested options for providing that documentation are as follows:

- Provide documentation of the maximum recommended amount of colorant added and the corresponding VOC content of the colorants in the form of MSDSs or other test documentation directly from the colorant supplier. Green Seal™ will calculate the total amount of VOCs in the product by adding the colorant amount to the amount of VOCs in the base paint product, and ensure that it meets the requirements of Section 4.5 Colorants Added at the Point-of-Sale.
- Provide VOC laboratory results for a sample of each paint type (flat, non-flat, primer, etc) that contains the maximum amount of colorant that can be added at the point of sale. The VOC laboratory analysis must use a direct measurement such as ASTM 6886-03 or ISO11890-2, and must be modified to use a 280 degree C boiling point limit. The final result must be converted to a coating VOC result (excluding water) in grams/liter. The total VOC result must meet the requirements of Section 4.5 Colorants Added at the Point-of-Sale VOC Content Limit.
- If no information is available about the VOC content in the colorants, an average of 70 grams/liter will be added to the VOC content of the base paint product, for each paint type (flat, non-flat, primer, etc), to determine compliance. In order to find more information about the background for the determination and use of 70 grams/liter, please review the GS-11 Standard Development background documents online: http://greenseal.org/certification/g11_paintstandard_dev.cfm

If the product does not comply with the VOC content limits, you must take one of the following actions:

- Reduce the VOC content in the base paint product until the product(s) meet the VOC requirements of Section 4.5. If you change the VOC content in the base paint product, you must submit VOC laboratory analysis data that shows that a direct measurement such as ASTM 6886-03 or ISO11890-2 was used, and the method was modified to use a 280 degree C boiling point limit.
- Select a set of colorants that will meet the requirements of Section 4.5 with the base paint product and describe the process by which you will ensure that those colorants are used with your product at the point-of-sale. You should provide documentation of the maximum recommended amount of colorant added and the corresponding VOC content of the colorants in the form of MSDSs or other test documentation directly from the colorant supplier in addition to how you will ensure that the selected set of colorants will be the colorants used at the point-of-sale. There should be a reference to the selected set of colorants on the product label or other product information sheet for the user.

The effective date of implementation for Section 4.5 is January 1, 2010, but to allow adequate time to collect materials and submit information for review, Green Seal will allow until **February 15, 2010** to submit materials for compliance to 4.5 VOC Content Limits for Colorant Added at the Point-of-Sale. If you have any questions about the implementation time period or the GS-11 Environmental Standard requirements, please contact Green Seal at certification@greenseal.org or 202-872-6400. If you do not submit materials by the deadline listed, your product(s) are considered not compliant with the requirements of the GS-11 Environmental Standard and **certification may be terminated**.

You may submit materials by email to certification@greenseal.org with the subject header: "GS-11 Colorant Added at the Point-of-Sale", by fax to 202-872-4324 or by postal mail:

Green Seal, Inc.
ATTN: GS-11 Colorant Added at the Point-of-Sale
1001 Connecticut Ave NW, Suite 827
Washington DC 20036

Please remember supporting materials must be received by Green Seal no later than **February 15, 2010** in order to meet the requirements of the GS-11 Environmental Standard.

Thank you for participating in our efforts to provide a more sustainable marketplace. Green Seal looks forward to receiving the additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Petruzzi", with a long horizontal flourish extending to the right.

Mark Petruzzi
Vice President of Certification