



## Comments received for Scoping Document:

Green Seal Standard GS-11, Environmental Standard for Paint  
Green Seal Standard GC-03, Environmental Criteria for Anti-Corrosive Paints

*On May 29, 2007, Green Seal initiated the revision of GS-11, for Paints. As part of the revision, GC-03 for Anti-Corrosive Paints is intended to be **incorporated** into GS-11. Green Seal solicited comments for the Draft Scoping Document beginning on May 29 and closing on June 13 (two weeks). 17 comments were received. The received comments are summarized below under the original GS-11 subject headers in **bold**. (There is no identification of commenters.) The final header of "Climate Change" categorizes the responses to the question posed for reducing impacts to climate change.*

### **1. Scope.**

- Include elastomeric Coatings (coating for cementitious substrates)
- Why are stains, clear finishes, and paints sold in aerosol cans excluded from the original scope?
- Do excluded stains include traditional oil-based wood stains and water-based acrylic concrete stains?
- Does current GS-11 include reactive stains for mineral substrates?
- Horizontal applications are acceptable but many floor coatings are clears
- If you incorporate GC-03, you should include aerosol cans
- Scope should specify paint and primers
- Scope needs to be clearer on what types of paints or coatings are covered
- Will GS-11 accommodate "environmentally-friendly" coatings like milk and collagen-based paints?
- Do not change the scope

### **2. Definitions.**

#### **2.1. Paint**

- Define "paint" and "coating" separately; use industry definition: paint as 6 mil dry fill thickness (DFT) or less and coatings as more than 6 mils DFT
- Definition describes clears and pigmented coatings, but clears are excluded in Scope
- Use "protective coating" in paint definition to broaden scope
- Use CARB definition of paint - "any pigmented liquid, liquefiable, or mastic composition designed for application to a substrate in a thin layer which is converted to an opaque solid film after application and is used for protection, decoration or identification, or to serve some functional purpose such as the filling or concealing of surface irregularities or the modification of light and heat radiation characteristics."
- Definitions are adequate as is

## **2.2. Volatile Organic Compounds**

- Use Europe's definition of VOCs to include maximum boiling point limit
- Evaluate other method (instead of Method 24) to determine Minimum Inhibitory Concentration (MIR)
- Reference ASTM D6886 for determining VOCs
- Use Environmental Choice definition of VOCs – “compounds that participate in atmospheric photochemical reactions to create smog and/or contribute to poor indoor air quality”
- Use CARB consumer product definition of VOCs or EPA VOC definition
- Do not include boiling point or vapor pressure in definition
- Definitions are adequate as is

## **2.3. Aromatic Compounds**

- Clarify definition to define specific aromatic compound excluded (i.e. volatile or non-volatile)
- Specify between volatile and non-volatile aromatic compounds
- Change to “volatile aromatic compounds”
- Exempt polystyrene and styrenated acrylics

## **Additional Definitions Comments**

- Include definition of Ingredient, 0.1% consistent with OSHA reporting requirements for carcinogens
- Include definition of Environmental

## **3. Product-Specific Performance Requirements.**

### **3.1. Interior Topcoats**

#### **3.1.1. Scrubbability**

- Increase requirement

#### **3.1.2. Hiding Power**

- Increase requirement to 0.97 or 0.98 contrast ratio

#### **3.1.3. Washability**

- Better define test parameters (type of stain used)

### **3.2. Exterior Topcoats**

#### **3.2.1. Hiding Power**

- Increase Requirement

## **Additional Performance Requirement Comments**

- More Exterior performance requirements
- Tests for long-term durability like ASTM D-6083, Elastomeric Coatings for Roofing
- Incorporate some of the 34 ASTM standards, like accelerated weathering, biological growth, wet & dry adhesion, flow & leveling, UV colorfastness

- Include language to use the most current version of any cited standard
- Include reflectivity standards
- Use MPI performance standards
- Add new physical property and energy-efficient requirements like solar reflectance, thermal emittance and solar reflective index
- Add section for primers
- Add performance requirements for GC-03
- Differentiate between residential and commercial applications
- Get rid of performance requirements altogether (allow market forces to determine)
- Performance requirements are adequate as is

#### **4. Product-Specific Environmental Requirements.**

##### **4.1. VOCs**

- Add specification for amount of VOCs emitted as measured by closed chamber test
- VOCs should include colorants added at point of sale
- Lower VOC limits
- Add section for VOC of primers
- Add section for VOC of anti-corrosive paints
- Reconsider citing Method 24
- Change VOC to 100 g/L across the board
- Adopt as minimum EPA VOC limits
- VOC limits are adequate as is
- Do not use Rule 1113 VOC limits

##### **4.1.1. Aromatic Compounds**

- 1% should not include all aromatics, not all are hazardous
- Aromatic polymer latex emulsions should be excluded, specify “volatile aromatic compounds”
- [See comments for aromatic compounds in “Definitions” section]
- Aromatic compound limit is adequate as is

##### **4.2. Chemical Component Restrictions**

- Be specific in listing individual chemicals, do not use peer-reviewed lists
- Use peer-review lists
- Peer-review lists would be too prohibitive, useful constituents may be excluded
- Exclude polymerized vinyl chloride from “vinyl chloride” restriction
- Add aqueous ammonia, crystalline silica, arsenic, triphenyl tins (TPN), tributyl tins (TBT), and various glycol ethers
- Individual ingredient list is adequate as is

#### **5. Packaging Requirements.**

##### **5.1. Toxics in Packaging**

- Consider recyclability of container
- Require waste management plan or waste management education of consumer
- Lead requirement is out of date
- Include PCR in containers
- Current packaging requirements are adequate as is

**Appendix: Labeling Requirement for Certification by Green Seal.**

- Include solar reflectance, thermal emittance and Solar Reflective Index on label
- Include end-of-life management text on label
- Class A rating should be explained and appropriately referenced
- Reword statement for consumer to recycle or reuse leftover paint and not dispose down drains
- Include text encouraging source reduction (only buying what is needed)
- Indicate on label if manufacturers have take-back program

**Climate Change**

- Reward/recognize manufacturers with take-back program
- Add innovation category to recognize more efficient distribution systems
- Use tiered system to recognize higher environmental performance
- Additional points for manufacturers that use renewable energy
- Adopt energy-efficiency in standard (reflective coatings)
- Recognize value of cool surfaces (combat “Heat Island Effect”)
- Domestic sourcing of raw materials
- Consider longevity of applied product—good quality, properly applied product