



Ms. Lisa P. Jackson  
Administrator  
U.S. Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

January 29, 2009

Dear Administrator Jackson,

We are writing to share our findings and recommendations about no- and low-VOC paints, a topic we are covering in a report in the March 2009 issue of *Consumer Reports*.

Our study investigated the accuracy of the claims made by the manufacturers of several interior paints we tested for this annual product report. We contracted with a certified independent laboratory to measure the concentrations of volatile organic compounds in both untinted bases and tinted paints of eight products marketed as zero-VOC. In every case, the lab, using the nationally referenced Environmental Protection Agency Method 24, detected VOCs even in the untinted bases, though no level exceeded any applicable government limits. While no- and low-VOC paints might have value to offer to consumers by mitigating VOC exposure, we believe that there need to be clear guidelines on manufacturer labeling of these claims.

We also found that the pigments used in nearly all paints contain VOCs, and our limited test found that tints can more than double VOC levels. We believe that the EPA should require VOC limits for pigments.

Consumers Union, the nonprofit publisher of *Consumer Reports*, also urges the EPA to include a new test for paint VOCs as part of its planned proposal this May for new federal VOC regulations for paints and coatings. The current test, which was never intended to measure VOC levels below 100 grams per liter (g/l), is no longer sufficient in today's marketplace. Employing a test capable of measuring VOC levels down to zero is the only way to accurately quantify paints that claim to have zero VOCs or low levels of these compounds.

Based on the potential for VOCs to contribute to environmental health problems, including respiratory illnesses and nervous-system impairment and the potential for even more harmful effects, Consumers Union is asking the EPA to follow through on the May proposal to create new federal VOC regulations and expedite the proposed targeted effective date in 2011. This is especially important since no- and low-VOC paints can offer a perceived health benefit to

consumers, with several low-VOC paints on the market earning good to very good ratings in overall performance in our report. Lower VOC levels in paints are achievable since several manufacturers already offer products that comply both with California's standards (150 g/l for nonflat finishes and 100 g/l for flat) and with the state's most stringent regulatory limits (50 g/l for all finishes, set by the South Coast Air Quality Management District).

Finally, several studies, including those carried out by the EPA, have shown that indoor air can contain significantly higher VOC levels than outdoor air. While we commend the EPA for its indoor-air-quality research and public-education efforts, we urge the agency to take the necessary steps to create a standard for VOC pollutants in indoor air and regulate it, based on safe levels for public health and the environment.

Thank you for your consideration.

Sincerely yours,

Urvashi Rangan, Ph.D.  
Senior Scientist &  
Policy Analyst  
Consumers Union

Steven H. Saltzman  
*Consumer Reports*  
Deputy Editor

John Galeotafiore  
Associate Director,  
Home Improvement  
Consumers Union

cc: Mr. Tom Kelly, Director, Indoor Environments Division, Office of Radiation and Indoor Air, U.S. EPA, Washington D.C.

Mr. Robert Thompson, Chief, Indoor Environment Management Branch, National Risk Management Research Laboratory, U.S. EPA, North Carolina

Mr. Robert Benson, Division Director, Sector Strategies Division, Office of Policy, Economics and Innovation, U.S. EPA, Washington D.C.

Mr. Barry Elman, Senior Program Manager, Sector Strategies Division, Office of Policy, Economics and Innovation, U.S. EPA, Washington D.C.

**Consumers Union  
Headquarters Office**  
101 Truman Avenue  
Yonkers, New York 10703-1057  
(914) 378-2029  
(914) 378-2992 (fax)

**Washington Office**  
1666 Connecticut Avenue, NW,  
Washington, DC 20009-1039  
(202) 462-6262 Suite 310  
(202) 265-9548 (fax)

**West Coast Regional Office**  
1535 Mission Street  
San Francisco, CA 94103-2512  
(415) 431-6747  
(415) 431-0906 (fax)

**South West Regional Office**  
1300 Guadalupe, Suite 100  
Austin, TX 78701-1643  
(512) 477-4431  
(512) 477-8934 (fax)