

From: [Mark Monique](#)
To: ["SaferConsumerProducts@dtsc.ca.gov"](mailto:SaferConsumerProducts@dtsc.ca.gov)
Subject: Methylene Chloride - Comments
Date: Monday, May 19, 2014 10:59:00 AM
Attachments: [PAINT REMOVER STUDY.pdf](#)

Savogran is an employee owned company located in Norwood, Massachusetts that produces paint and varnish removers. Our products are marketed nationally to the hardware, paint and home center retail trade.

Savogran uses methylene chloride as an article component in the formulation of paint and varnish removers. No known substitute chemical removes paint as effectively as methylene chloride. The alternatives on the market are not functionally acceptable.

I've included a paint remover study demonstrating the inadequacies of the alternative retail paint stripping products. The only two alternative products that performed reasonably well contained n-methyl-2-pyrrolidone which is a chemical of concern.

Retail paint removers are typically used by consumers very infrequently. Savogran product labeling has evolved over many decades. Today's label includes warnings to use the product outdoors when possible. Warnings that the product should not be used on a regular basis without properly engineered air control systems and that a dust mask does not provide adequate protection against the vapors.

Consumers have an expectation that the paint remover products work effectively and efficiently. The alternative products do neither. The alternative products have a very low consumer acceptance rate. The alternative raw materials such as dibasic esters and benzyl alcohol are also very costly as compared to methylene chloride. This can be demonstrated by the lack of alternative gallon size products offered in the market place.

Paint remover in California is regulated at a 50% by weight VOC limit. Methylene chloride is a critical component allowing for the formulation of compliant products. The alternative option is increased amounts of acetone in an Acetone/Toluene/Methanol blend which creates an acute flammability hazard. LVP compounds such as benzyl alcohol are also coming under increased scrutiny as potential VOCs as argued in a December, 2012 South Coast Air Quality Management District study

A life cycle consideration should be given to the product packaging as related to the California Rigid Plastic Packaging Container Law. The alternative products are universally packaged in plastic versus the traditional methylene chloride products in metal containers.

Mark Monique
President
Savogran Company
PO Box 130
Norwood, MA 02062-0130

Phone: (781) 762-5400 Fax: (781) 762-1095

www.savogran.com

Manufacturing paint remover, solvents, cleaning and patching compounds since 1875.