

California
Department of Food and Agriculture
Division of Measurement Standards
Petroleum Products Program

**California's Labeling Requirements for
Motor Oil, Gear Oil, and Automatic Products**

Bureau of Automotive Repair Advisory Group Meeting
October 14, 2014

Allan Morrison

California Department of Food and Agricultures' Role in Petroleum Products

The CDFA's Petroleum Products Program maintains and enforces the minimum quality specification for most petroleum and automotive products sold in California. Additionally, the Program regulates the advertising and labeling of these products.

Laws and Regulations

- The laws relating to petroleum products were first enacted in 1931 and are found in the California Business and Professions Code (BPC), Division 5, Chapters 14 and 15.
- Regulations that further define and implement the laws are found in the California Code of Regulations (CCR), Title 4, Division 9, Chapters 6, 7, and 8.
- Violations of the petroleum laws are classified as misdemeanors and carry fines of up to \$1,000 per violation and/or six months in the county jail.
- <http://www.cdfa.ca.gov/dms/>

CDFA's Petroleum Product Program Regulates Labeling

- Petroleum Products:
 - Motor Oil
 - Gear Oil
- Automotive Products:
 - Engine Coolant
 - Automatic Transmission Fluid
 - Brake Fluid

CDFA Requires Labeling On

- Bulk Storage Tanks
- Bulk Product Delivery Vehicles
- Totes
- Drums
- Shop Storage Tanks
- Overhead Reels
- Package Products

Labeling Law for Oils

- There shall be affixed to each container, receptacle, pump, dispenser, and inlet end of the fill pipe of each underground storage tank, from which or into which that product is drawn or poured out for sale or delivery, a sign or label plainly visible consisting of the name of the product, the brand, trademark, or trade name of the product.
- When the product is oil each sign or label shall have the viscosity grade classification for engine oil viscosity classification SAE J300 or manual transmission and axle lubricants viscosity classification SAE J306, as applicable, and shall be preceded by the letters “SAE.”

Motor Oil and Gear Oil

- On each container, receptacle, pump, dispenser, and inlet fill pipe
 - Product Name: Motor Oil or Gear Oil
 - Brand Name
 - SAE Viscosity Grade
- On the container only
 - API/SAE Service Class
 - Name and Address of Producer or Distributor
 - Net Quantity Statement

Concentrated Engine Coolant

- Product : “Engine coolant” or “Antifreeze” must be used
- Brand name
- Principal Ingredient: Ethylene or Propylene Glycol
- Intended application with ASTM Specification
- Name and place of business of manufacturer, packer, seller or distributor
- A chart showing freeze protection to at least -30 Fahrenheit
- Boiling point of a 50/50 mix in degrees Fahrenheit.
- A lot or batch number
- Accurate statement of quantity

Prediluted Engine Coolant

- Product: Prediluted engine coolant or Prediluted antifreeze must be used
- Brand name
- Principal ingredient: Ethylene or Propylene Glycol
- Intended application with ASTM Specification
- Name and place of business of manufacturer, packer, seller or distributor
- Freeze point and boiling point in degrees Fahrenheit
- The words “DO NOT ADD WATER”
- Lot or batch number
- Accurate statement of quantity

Automatic Transmission Fluid

- Product: Automatic Transmission Fluid must be used.
- Brand Name
- Duty type classification
- Name and place of business of manufacturer, packer, seller, or distributor.
- Accurate statement of quantity

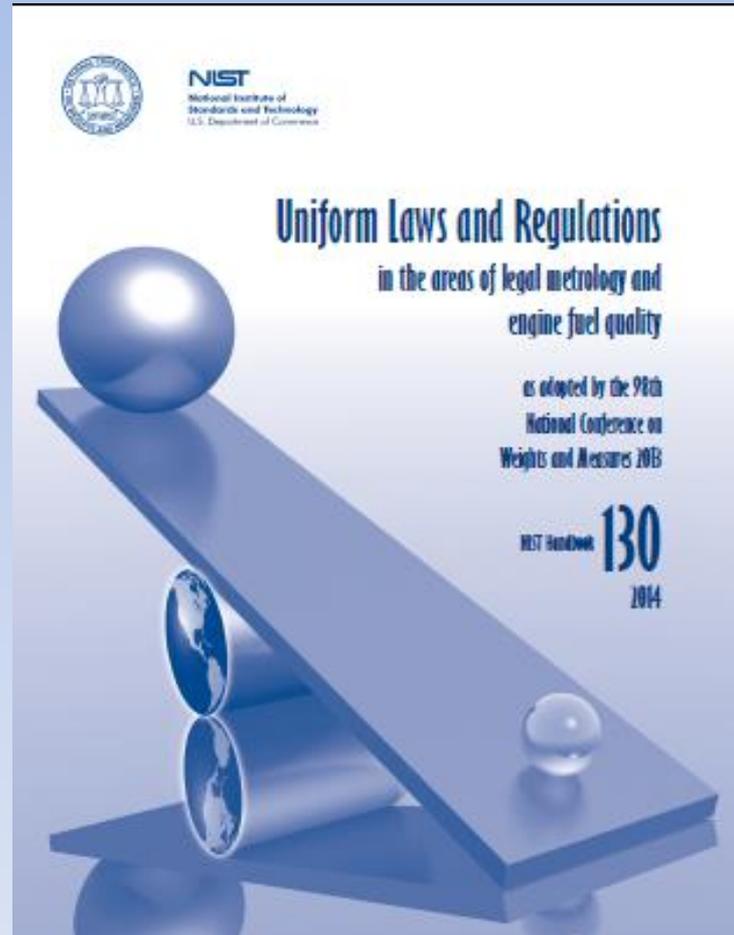
Brake Fluid

- Brand name
- A label which conforms to the requirements of the National Highway Traffic Safety Administration, United States Department of Transportation
- An accurate statement of the quantity

USDOT Brake Fluid Label Requirements

- Certification that the brake fluid conforms to § 571.116.
- The name of the packager of the brake fluid, which may be in code form. The name and complete mailing address of the distributor.
- A serial number identifying the packaged lot and date of packaging.
- Designation of the contents as “DOT—MOTOR VEHICLE BRAKE FLUID
- The minimum wet boiling point in Fahrenheit of the DOT brake fluid in the container.
- The following safety warnings in capital and lower case letters as indicated:
- (1) FOLLOW VEHICLE MANUFACTURER'S RECOMMENDATIONS WHEN ADDING BRAKE FLUID.
- (2) KEEP BRAKE FLUID CLEAN AND DRY. Contamination with dirt, water, petroleum products or other materials may result in brake failure or costly repairs.
- (3) STORE BRAKE FLUID ONLY IN ITS ORIGINAL CONTAINER. KEEP CONTAINER CLEAN AND TIGHTLY CLOSED TO PREVENT ABSORPTION OF MOISTURE.
- (4) *CAUTION*: DO NOT REFILL CONTAINER, AND DO NOT USE FOR OTHER LIQUIDS. (Not required for containers with a capacity in excess of 19 L.)

NIST Handbook 130



<http://www.nist.gov/pml/wmd/pubs/hb130-14.cfm>

NIST Handbook Requirements

- California does not adopt the requirements of Handbook 130 “**Uniform Laws and Regulations in the Areas of Legal Metrology and Engine Fuel Quality**” for motor oil labeling requirements
- California does adopt the requirements of Handbook 133 “**Checking the Net Contents of Packaged Goods**”

GLOBALLY HARMONIZED SYSTEM OF CLASSIFICATION AND LABELLING OF CHEMICALS

- Impacts both Chemical Producers and Chemical Users
- Major changes to the Hazard Communication Standard; Hazard Classification; Labels, Safety Data Sheets; and Information and training
- Regulated by OSHA not by CDFA
- www.osha.gov/dsg/hazcom/HCSFactsheet.html

GHS Chemical Manufacturers, Importers, Distributors

- **Labels:** Chemical manufacturers and importers must provide a label that includes a signal word, pictogram, hazard statement, and precautionary statement for each hazard class and category.
- **Safety Data Sheets:** The new format requires 16 specific sections, ensuring consistency in presentation of important protection information.
- **Required to comply:** by June 1, 2015, however old product may be shipped until December 1, 2015.

GHS Employers Responsibility

- December 1, 2013 Train employees on the new label elements and new Safety Data Sheet format.
- June 1, 2016 Update alternative workplace labeling and hazard communication program as necessary, and provide additional employee training for newly identified physical or health hazards.

Questions and Answers



Contact Information

Allan Morrison, Senior Environment Scientist

Fuels and Lubricants Laboratory

Division of Measurement Standards

6790 Florin Perkins Rd, Suite 100

Sacramento, CA 95828

916-229-3046

Allan.Morrison@cdfa.ca.gov