

Proposed Amended Rule 1168 Adhesive and Sealant Applications



Working Group Meeting
February 5, 2014

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Agenda

- Introductions
- Response to Public Workshop Comments
 - Applicability
 - Definitions
 - Proposed Limits
 - Test Methods
 - Administrative
 - Sell-through/Use-through
 - Exemptions
- Future Meeting Schedule
- Adjourn



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Public Workshop Comments

- 17 verbal comments
- 37 written comments
 - 9 CEQA comment letters
 - 28 rule comment letters
- Will be providing initial responses today
- Further opportunities to provide comments as rule development process continues

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Comment Response Process

- Letters included in staff report
- Individual comments bracketed
- Response provided in staff report
 - May refer to previous similar comments and responses
- Verbal (only) comments also responded to



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Rule Applicability

- **Exempt consumer products used for repair and maintenance**
 - Pending. Will define repair and maintenance based on Regulated Products.
- **Rule should not apply to consumer products**
 - Disagree. Rule includes consumer products used in manufacturing.
- **Rule should not apply to aerosol adhesives**
 - Disagree. All technologies shall meet the same limits.



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Definitions

- **Harmonize definitions with OTC Rule**
 - Agree. Some minor differences may be needed.
- **Revise Cyanoacrylate definition**
 - Agree. Will work on definition based on curing mechanism.
- **Expand Automotive Glass Primer definition**
 - Agree. Will expand to vehicles.
- **Support/Oppose TBAC exemption**
 - Pending. CEQA assessment necessary.

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VOC Limits



- **Low limits subject to freeze/thaw issues**
 - Disagree. Low-VOC products currently available.
- **Reactive chemistries may not comply**
 - Pending. Proposing new test methods to address concern
- **Pressure Sensitive Adhesive Primer requires new limit**
 - Agree. Recommend 785 g/L limit.
- **Static Dissipative Tile Adhesive needs 50 g/L limit**
 - Pending. Reviewing available low-VOC alternatives.

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VOC Limits (Cont.)

- **Wood Flooring limit should be 50 or 100 g/L**
 - Agree. Recommend 50 g/L limit.
- **Multi-purpose Construction Adhesive limit too low**
 - Disagree. Low-VOC products available
- **Subfloor Adhesive limit should be 50 g/L**
 - Agree. Recommend 50 g/L limit.
- **Structural Wood Membrane Adhesive should be 50 g/L**
 - Agree. Recommend 50 g/L limit.

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VOC Limits (Cont.)

- **Foam Sealant limit infeasible due to cost**
 - Disagree. Alternative propellants appears cost-effective.
- **Architectural Sealant limits too low**
 - Disagree. Low-VOC products available
- **Support proposed Top and Trim limit**
 - Agree.
- **Air Barriers better fit for Rule 1113**
 - Pending. Additional review of various technologies necessary.



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VOC Limits (Roofing)

- **Single-Ply Roof Adhesive limit too low**
- **Single-Ply Roof Sealant limit too low**
- **Other Roof Adhesive limit too low**
- **Other Roof Sealant limit too low**
 - Pending. Reviewing available products and TBAC/DMC opportunities
- **Clear, paintable, water-resistant sealant requires special limit**
 - Pending. Reviewing available architectural sealants and roof sealants.



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Other Requirements

- **Unlimited or three year sell-through**
 - Agree. Will extend sell-through/use-through to three years.
- **Storage deviation not reportable if found by facility**
 - Disagree. Extended compliance dates and sell-through sufficient
- **Consumer product use in manufacturing not seller's responsibility**
 - Agree. Sales prohibition excludes CARB regulated consumer products



Administrative

- **Annual reporting too burdensome**
 - Agree. Recommend three consecutive years only.
- **Reporting 55 gal/yr exemption users burdensome**
 - Disagree. Proposed rule addresses most current exemption users. (i.e. Top & Trim, Rubber Vulcanization)
- **Report submittal date should be in September**
 - Agree.
- **Allow date codes on containers**
 - Agree.
- **Allow data sheets for thinning recommendations**
 - Agree.
- **Maintain records for three years only**
 - Agree.

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Test Methods

- **Include thin-film test method for Energy Curable products**
 - Pending. Need protocol for field collected samples.
- **Include test method(s) for emerging technologies**
 - Agree. Including Appendix A to Subpart PPPP of 40 CFR Part 63



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Exemptions/Miscellaneous

- **Expand 55 gal/yr exemption to critical infrastructure**
 - Disagree. Sell-through extension should address issue.
- **Exempt repairs of potable water reservoir cover**
 - Agree. Considering appropriate mechanism.
- **Exempt 160 oz/day aerosol usage**
 - Disagree. 16 oz/day nearly identical to 55 gal/yr
- **Exempt specialty shoe manufacturing**
 - Pending. Awaiting testing documentation.
- **Develop searchable database of available products**
 - Agree.

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Tentative Schedule

- Working Group meetings March?
- Report to Stationary Source Committee April 2014
- Public Hearing June 2014

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