

Proposed Amended Rule 1168 Adhesive and Sealant Applications



Working Group Meeting
September 19, 2013

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Agenda

- Introductions
- Survey
- Preliminary Draft Rule Language
 - Follow-up on issues raised to date
- TBAC / DMC
- Definitions
- Consumer Products
- Future Meeting Schedule

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Survey

- **Deadline extended to September 30th**
- **Questions or comments regarding survey?**

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Preliminary Draft Rule Issues Raised

- **55 gallon/yr exemption**
 - Necessary for smaller users
 - Need to address:
 - Top & Trim
 - Automotive Glass
 - Foam adhesives
 - Adhesive Primer
 - Reservoir covers
 - Specialty Shoe
 - Pressure Sensitive Adhesive Primer
 - Others
 - Considering compliance plan to qualify for exemption
- **Labeling**
 - Include small container exemption
 - Exclude products subject to CPR
 - High testing costs



VOC testing not required; formulation data acceptable

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Preliminary Draft Rule Issues Raised (Cont.)

- **Sell Through**
 - Avoid having products pulled from shelf
 - Tie Sell Through period to shelf life
 - Stagger Sell Through and Use Through periods
- **Group II prohibition would eliminate some silicone sealants**
- **Aerospace exemption should include sealants**
- **Aerosols**
 - Use monthly rolling average rather than daily limit
 - Use weight instead of fluid ounces
- **Too many categories – need consolidation**
- **Clerical errors / Definition inconsistencies**

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TBAC/DMC

- **Request from industry to classify TBAC/DMC as exempt compounds**
- **Limited classification requested for TBAC/DMC:**
 - **Categories:**
 - Single-ply roofing membrane sealant
 - Non-membrane roof sealant
 - Roadway sealant
 - Adhesives for traffic-marking tape
 - **Restrictions**
 - Outdoor applications
 - Contractor applied
 - PPE
- **Potential risk exposure analysis required for CEQA**



Source: www.prlog.org

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Definitions

- **Too many categories – need consolidation**
Considering broad architectural/construction category
- **Want to avoid defining individual words in definition and all possible combinations of words**
 - i.e. defining “architectural”, “sealant”, “primer” and “architectural sealant primer”
 - Considering “architectural” + “sealant” + “primer” = “architectural sealant primer”
- **Look to OTC Model Rule & CPR for consistency**
- **Need to clearly distinguish difference between “sealer” (Rule 1113) and “sealant” (Rule 1168).**

Requesting stakeholder feedback on Definition
Comparison table

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Consumer Products

- **Current SCAQMD position is that District regulates all consumer adhesives and sealants that CPR does not**
 - H & S Code
 - Correspondence
- **CPR limited to products < 16oz / 1 lb and all aerosol adhesives**
- **Considering eliminating consumer product VOC content exemption for manufacturing at stationary sources**
 - Labeling and prohibition of sale requirements would remain exempted



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Tentative Schedule

- Working Group meetings As Necessary
- Public Workshop Nov 2013
- Report to Stationary Source Committee TBD
- Public Hearing Q1 2014

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