Stakeholders raised concerns with:

- Aerosol Adhesive limited exemption
- Clarification between CARB CPR vs SCAQMD Rule 1168
- Frequency of Reporting
- VOC Limit Effective Dates
- Start date to prove compliance under prohibition of sale
Staff met with CARB staff who are currently surveying and evaluating current aerosol limits

Now proposing to maintain current exemption

Added specific reporting requirements in (f)(2)(C) for manufacturers

Reporting can remain in weight percent
REGULATORY AUTHORITY
- Clear, Paintable and Immediately Water-Resistant Sealant
- Establishment
- Institutional use
- Modified Bituminous Primer
- Modified Bituminous Materials
- Non-Staining Plumbing Putty
- Ozone-Depleting Compound
- PVC
- Toxic Air Contaminant
VOC LIMITS

- Extended effective dates:
  - Waterproof Resorcinol Glue
  - Reinforced Plastic Composite

- Added categories or reductions:
  - Top and Trim Adhesive – 250 g/L (*SIP equivalency*)
  - Other Plastic Cement Adhesives – 100 g/L
    - RACM/BACM commitment
  - All Other Sealants – 250 g/L
  - ADDED – Non-Staining Plumbing Putty – 150 → 50 g/L

- Reinstalled VOC Categories:
  - Rubber Floor Adhesive
  - Modified Bituminous Sealant Primer

- Removed:
  - “Other Substrates” – Substrate Specific Adhesives

### Table: VOC Content Limit (g/L)

<table>
<thead>
<tr>
<th>Category</th>
<th>VOC Content Limit (g/L)</th>
<th>Current</th>
<th>Upon Rule Adoption</th>
<th>1/1/2019</th>
<th>1/1/2021</th>
<th>1/1/2023</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Adhesives</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Architectural Applications</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rubber Floor Adhesive</td>
<td></td>
<td>60</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Welding</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>ABS to PVC Transition Cement</td>
<td></td>
<td>510</td>
<td></td>
<td></td>
<td></td>
<td>325*</td>
</tr>
<tr>
<td>CPVC</td>
<td></td>
<td>490</td>
<td></td>
<td></td>
<td></td>
<td>325*</td>
</tr>
<tr>
<td>PVC</td>
<td></td>
<td>510</td>
<td></td>
<td></td>
<td></td>
<td>325*</td>
</tr>
<tr>
<td>Other Plastic Cement Welding</td>
<td></td>
<td>250</td>
<td></td>
<td>100</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Top and Trim Adhesive</td>
<td></td>
<td>250</td>
<td></td>
<td>540</td>
<td>250</td>
<td></td>
</tr>
<tr>
<td>Waterproof Resorcinol Glue</td>
<td></td>
<td>250</td>
<td></td>
<td>170</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Substrate Specific Adhesive Applications</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Reinforced Plastic Composite</td>
<td></td>
<td>250</td>
<td></td>
<td>200</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Sealants and Caulks</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Architectural Applications</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Non-Staining Plumbing Putty</td>
<td></td>
<td>250</td>
<td></td>
<td>150</td>
<td></td>
<td>50</td>
</tr>
<tr>
<td>All Other Sealants</td>
<td></td>
<td>420</td>
<td></td>
<td>250</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Sealant Primers</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Modified Bituminous</td>
<td></td>
<td>500</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
- Separated language into two sections for clarity
- Substrate Specific Adhesive Applications
- Most restrictive clause
TEST METHODS

- Removed 316D – *method not fully developed, placeholder*
- Modified language referencing Appendix A to Subpart PPPP of 40 CFR Part 63
- Multiple Test Methods clause
  - Modified to clarify “when more than one *applicable* test method or set of test methods are specified for any testing”
ADMINISTRATIVE REQUIREMENTS

- Labeling
  - Consolidated all labeling requirements under one section including Top and Trim, Rubber Vulcanization Adhesive, Pressure Sensitive Adhesive Primer, and ABS to PVC Transition Cement

- Reporting
  - Changed reporting frequency to every 3 years until 2025, every 5 years thereafter
  - Aerosol adhesive and aerosol adhesive primer reporting required for products distributed into SCAQMD jurisdiction

<table>
<thead>
<tr>
<th>Reporting Deadline</th>
<th>Reported Years</th>
</tr>
</thead>
<tbody>
<tr>
<td>September 1, 2019</td>
<td>2016, 2017, 2018</td>
</tr>
<tr>
<td>September 1, 2022</td>
<td>2019, 2020, 2021</td>
</tr>
<tr>
<td>September 1, 2025</td>
<td>2022, 2023, 2024</td>
</tr>
<tr>
<td>September 1, 2030</td>
<td>2027, 2028, 2029</td>
</tr>
<tr>
<td>September 1, 2035</td>
<td>2032, 2033, 2034</td>
</tr>
<tr>
<td>September 1, 2040</td>
<td>2037, 2038, 2039</td>
</tr>
</tbody>
</table>
ADMINISTRATIVE REQUIREMENTS

- Aerosol reporting
  - Product manufacturer
  - Product name and code
  - VOC content, *in weight percent*
  - Total volume in gallons
  - Container size of product
ADMINISTRATIVE REQUIREMENTS

- 55 gal/year exemption
  - For facilities that utilize this exemption
  - Reporting includes name and address of company product was purchased from
Stakeholders requested starting date for proof of compliance for manufacturers or suppliers of noncompliant product.

Proposing start date of July 1, 2018 to provide adequate time to prepare and inform.
EXEMPTION

- Reinstated Aerosol Exemption, except for reporting
- Clarified CPR Exemption
SCHEDULE

- August 2   WGM #3 Comments Due
- August 17  Public Workshop
- August 31  PW Comments Due
- Sept 1     Set Hearing
- Sept 15    Stationary Source Committee Meeting
- October 6  Final Public Hearing