

## Proposed Amended Rule 1168 Adhesive and Sealant Applications



Source: [www.single-ply-usa.com](http://www.single-ply-usa.com)

Working Group Meeting  
October 31, 2013

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## Agenda

- Introductions
- Survey Data
- Preliminary Draft Rule Language
  - TBAC/DMC
  - Proposed VOC limits
  - 55 gal/yr exemption
  - Reporting
- Consumer Products
- Future Meeting Schedule

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# Survey

- 17 responses – 18 companies

Source	Volume (MM gal)	Emissions (tpd)
CPR*	0.88	0.34
Non-CPR*	0.62	0.41
Total	1.50	0.75

\*Consumer Product Regulation

- 2012 AQMP emission inventory: 3.49 tpd
- Survey well below projected emissions
  - Multiple categories with no volume reported
  - Concerns about using data for categories with less than 5 products or 5,000 gallons reported
- Potential follow-up with Notices to Comply

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# TBAC/DMC

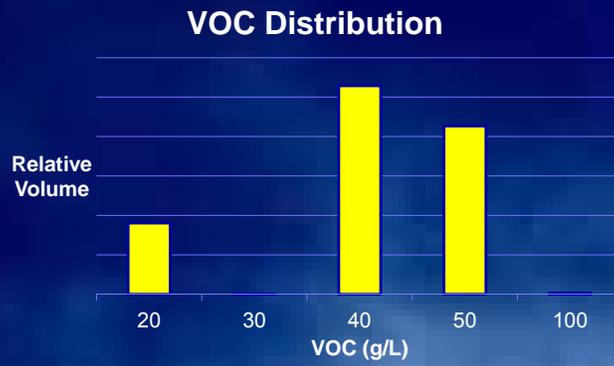
- Request from industry to classify TBAC/DMC as exempt compounds

For the purpose of this rule, tertiary butyl acetate (TBAC) and dimethyl carbonate (DMC) shall be considered exempt as a VOC only for purposes of VOC emission limitations or VOC content requirements when used in Architectural, Construction, Roofing regulated products. TBAC will continue to be a VOC for purposes of all recordkeeping, emission reporting, photochemical dispersion modeling, and inventory requirements which apply to VOCs.

- Considering limited exemption for roofing products
  - Limited to outdoor activity
  - Associated VOC limit reductions provide environmental benefit
- Potential risk exposure analysis required under CEQA

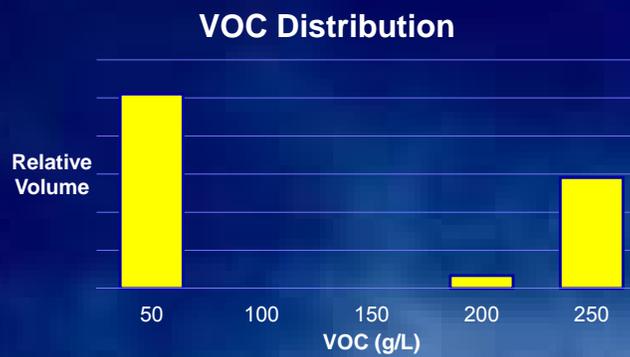
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## Multipurpose Construction Adhesives



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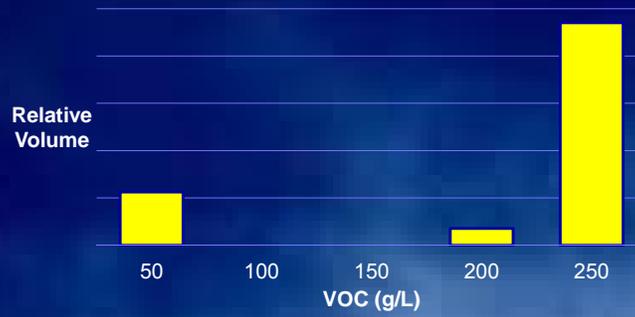
## Nonmembrane Roof Adhesives



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## Single-Ply Roof Adhesives

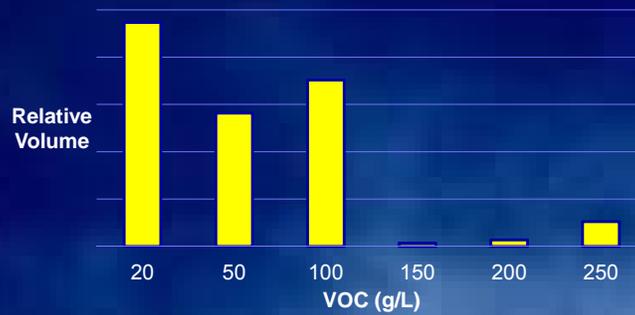
### VOC Distribution



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## Architectural Sealants

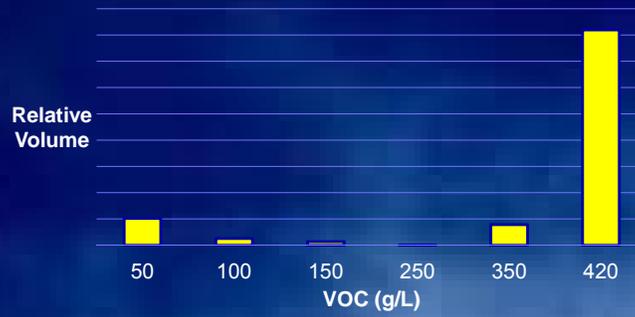
### VOC Distribution



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## Sealants - Other

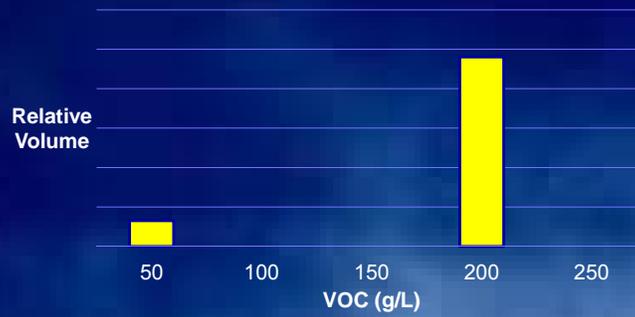
### VOC Distribution



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## Insulating Foam

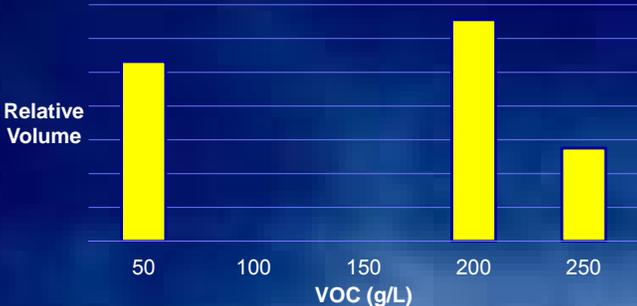
### VOC Distribution



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# Single-Ply Roof Sealant

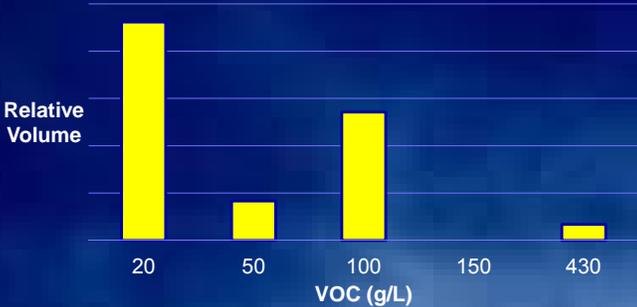
### VOC Distribution



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# Subfloor Adhesives

### VOC Distribution



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## Architectural Adhesives

Category	Current Limit (g/L)	Proposed Limit (g/L)*
Carpet Pad Adhesive	50	20
Ceramic Tile Adhesive	65	20
Cove Base Adhesive	50	20
Dry Wall and Panel Adhesive	50	20
Indoor Carpet Adhesive	50	20
Multipurpose Construction Adhesive	70	20
Other Roof Adhesive	250	100
Outdoor Floor Covering Adhesive	150	20
Rubber Floor Adhesive	60	20
Single Ply Roof Membrane Adhesive	250	100
Structural Glazing Adhesive	100	40
Structural Wood Member Adhesive	140	50
Subfloor Adhesive	50	20
VCT and Asphalt Tile Adhesive	50	20
Wood Flooring Adhesive	100	20

\*Effective Date TBD

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## Adhesives - Other

Category	Current Limit (g/L)	Proposed Limit (g/L)*
Rubber Vulcanization Adhesive**	850	250
Top and Trim Adhesive	250	540
Waterproof Resorcinol Glue	250	170

\*Effective Date TBD

\*\*Replaces Sheet-Applied Rubber Lining Operation

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## Substrate Specific Adhesives

Category	Current Limit (g/L)	Proposed Limit (g/L)*
Plastic Foams	50	20
Reinforced Plastic Composite	250	200

\*Effective Date TBD

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## Sealants

Category	Current Limit (g/L)	Proposed Limit (g/L)*
All Other Architectural	250	50
Foam Sealant	None	200/20**
Nonmembrane Roof	300	50
Roadway	250	50
Single-Ply Roof Membrane	450	100

\*Effective Date TBD

\*\*Interim limit followed by final limit

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## Sealant Primer

Category	Current Limit (g/L)	Proposed Limit (g/L)*
Architectural Porous	775	250

\*Effective Date TBD

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## VOC Limits Yet to be Addressed

- Architectural foam-to-foam adhesives
- Foam adhesives
- Pressure sensitive adhesive primers
- Reservoir cover repair adhesives
- Specialty shoe manufacturing



Source: [www.hollywoodfoam.net](http://www.hollywoodfoam.net)

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## 55 Gallon/yr Exemption

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- **Two major use groups identified**
  - Top & Trim
  - Rubber vulcanization adhesive/primer
- **Incorporating higher VOC limits to address technology limitations & narrow exemption**
- **Need mechanism to allow flexibility in rule while maintaining adequate control**
  - Requesting report of sales from suppliers
  - Considering small container exemption ( < 2 oz )
  - Considering smaller annual volume exemption

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## Reporting

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- **Annual report of regulated products sales with SCAQMD**
- **Due at the end of 1<sup>st</sup> quarter of each year for previous year's sales**
- **Include customer and product information for products sold utilizing 55 gal/yr exemption**
- **VOC calculation/testing data to determine VOC content available upon request**
  - Only products with VOC content of  $\leq 20$  g/L may provide unspecific VOC content

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## Consumer Products

- SCAQMD 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
  - Aerosol exclusion in H & S Code § 41712 (h) expired 1/1/2000
- Considering eliminating consumer product (including aerosol) 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 20, 2013 |
| ▪ Report to Stationary Source Committee | TBD          |
| ▪ Public Hearing                        | Q1 2014      |

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