Proposed Amended Rule 1168
Adhesive and Sealant Applications

Working Group Meeting
February 5, 2014

Agenda

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

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
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.

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.
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.

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.
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.

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.
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.
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

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.
Tentative Schedule

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

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