WGM #1

- Stakeholders requested:
  - DMC toxicity information
  - Preliminary rule language
  - Clarification on VOC labeling
  - Reporting not be conducted annually
  - Data from survey
  - Regulatory authority over consumer products
  - Delay Public Hearing
Points of Focus for WGM#2

- Proposed Amendments
- PAR 1168 (a):
  Purpose and Applicability
- PAR 1168 (c)(1):
  Table of Standards (VOC Limits)
- PAR 1168 (f)(2):
  Reporting Requirements
- PAR 1168 (i)(10):
  Aerosol adhesive exemption
- PAR 1168 (i)(11):
  Exemption for CARB applicable products
Preliminary Rule Language

- **Released June 9, 2017**
- **Applicability** [PAR 1168 (a)]
- **Certain definitions/categories** [PAR 1168 (b)]
- **Proposed VOC Limits in Table of Standards & Technology Assessment** [PAR 1168 (c)(1)]
- **Sell-Through/Use-Through Provision** [PAR 1168 (c)(3)]
- **Test Methods** [PAR 1168 (e)]
  - **Equivalent Test Methods** [PAR 1168 (e)(5)]
  - **Multiple Test Methods** [PAR 1168 (e)(6)]
- **Labeling Requirements** [PAR 1168 (f)(1)]
- **Reporting Requirements** [PAR 1168 (f)(2)]
## Table of Standards: Proposed Categories

<table>
<thead>
<tr>
<th>Category</th>
<th>Current (2005 Version)</th>
<th>Upon 2017 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>
</tr>
<tr>
<td>Building Envelope Membrane Adhesive</td>
<td>250</td>
<td>250</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other Outdoor Floor Covering Adhesives</td>
<td>150</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other Roof Adhesive</td>
<td>250</td>
<td>200</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Single-Ply Roof Membrane Adhesive</td>
<td>250</td>
<td>200</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CPVC Welding</td>
<td>490</td>
<td>325 a</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PVC Welding</td>
<td>510</td>
<td>325 a</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Wood Flooring Adhesive</td>
<td>100</td>
<td>20</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Edge Glue</td>
<td>250</td>
<td>250</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rubber Vulcanization Adhesive</td>
<td>250 b</td>
<td>850</td>
<td>250</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Top and Trim Adhesive</td>
<td>250 b</td>
<td>540</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Waterproof Resorcinol Glue</strong> c</td>
<td>250</td>
<td>170</td>
<td></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>
</tr>
<tr>
<td>Reinforced Plastic Composite c</td>
<td>250</td>
<td>200</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Sealants and Caulks</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Clear, Paintable, Immediately Water-Resistant</td>
<td>250</td>
<td>380</td>
<td>250</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Foam Sealant</td>
<td>250</td>
<td>200</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Grout</td>
<td>250</td>
<td>65</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>All Other Roof</td>
<td>300</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Single-Ply Roof Membrane</td>
<td>450</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>All Other Architectural Applications</td>
<td>250</td>
<td>50</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>All Other Sealants</td>
<td>420</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Adhesive Primers</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Pressure Sensitive</td>
<td>250</td>
<td>785</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Vehicle Glass</td>
<td>250</td>
<td>700</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- a. Contingent on ASTM change
- b. Predominantly sold under the 55 gals/year exemption
- c. EPA's RACM/BACM requirements
- d. Tech Assessment one year prior to January 1, 2023
Survey Data

- 2012 sales and emissions data
- 64 companies
- Approximately 3,000 products
- Included regulatory and actual VOC content
- An * near the title of the graph indicates that specific volumes are not provided for confidentiality purposes
Non-Membrane Roof Adhesive - Sales Volume (~244,000)

Current Limit: 250 g/L
SWA VOC: 127 g/L
Proposed Limit: 200 g/L
Em Reduction: 0.03 tpd

Non-Membrane Roof Adhesive - Product Count (31)
Single Ply Roof Adhesive - Sales Volume (~260,000)

Current Limit: 250 g/L
SWA VOC: 152 g/L
Proposed Limit: 200 g/L
Em Reduction: 0.05 tpd

Single Ply Roof Adhesive - Product Count (53)
Current Limit: 490 g/L
SWA VOC: 490 g/L
Proposed Limit: 325 g/L
Em Reduction: 0.015 tpd
PVC Welding - Sales Volume (~160,000)

Current Limit: 510 g/L
SWA VOC: 472 g/L
Proposed Limit: 325 g/L
Em Reduction: 0.3 tpd

PVC Welding - Product Count (163)
Wood Flooring Adhesive - Sales Volume (~799,000)

Current Limit: 100 g/L
SWA VOC: 51 g/L
Proposed Limit: 20 g/L
Em Reduction: 0.21 tpd

Wood Flooring Adhesive - Product Count (35)
Other Outdoor Floor Covering - Sales Volume*

Current Limit: 150 g/L
SWA VOC: 18 g/L
Proposed Limit: 50 g/L
Em Reduction: 0 tpd

Other Outdoor Floor Covering - Product Count*
Clear, Paintable, Immediately Water Resistant - Sales Volume*

Current Limit: 380 g/L
SWA VOC: 373 g/L
Proposed Limit: 250 g/L
Em Reduction: 0.01 tpd

Clear, Paintable, Immediately Water Resistant - Product Count*
Non-Membrane Roof Sealant - Sales Volume (~769,000)

Current Limit: 300 g/L
SWA VOC: 219 g/L
Proposed Limit: 250 g/L
Em Reduction: 0.12 tpd

Non-Membrane Roof Sealant - Product Count (98)
Single Ply Roof Sealant - Sales Volume (~8,000)

Current Limit: 450 g/L
SWA VOC: 153 g/L
Proposed Limit: 250 g/L
Em Reduction: 0.002 tpd

Single Ply Roof Sealant - Product Count (33)
Foam Sealants - Sales Volume (~155,000)

Current Limit: 200 g/L
SWA VOC: 152 g/L
Proposed Limit: 50 g/L
Em Reduction: 0.18 tpd

Foam Sealants - Product Count (16)
Sealant - Architectural - Sales Volume (~1,230,000)

Current Limit: 250 g/L
SWA VOC: 165 g/L
Proposed Limit: 50 g/L
Em Reduction: 0.3 tpd

Sealant - Architectural - Product Count (704)
Sealant Other - Sales Volume (~69,000)

Current Limit: 420 g/L
SWA VOC: 326 g/L
Proposed Limit: 250 g/L
Em Reduction: 0.05 tpd

Sealant Other - Product Count (73)
Reporting Requirements

Manufacturer, Private Labeler

- Product manufacturer (as listed on the label)
- Product name and code
- Product category
- VOC of Regulated Product
- VOC of Material
- Total volume sold
  - Including products sold through big box retailers
  - If product sold under sell-through provision

Reporting Timeline

<table>
<thead>
<tr>
<th>Reporting Deadline</th>
<th>Reported Years</th>
</tr>
</thead>
<tbody>
<tr>
<td>September 1, 2018</td>
<td>2016, 2017</td>
</tr>
<tr>
<td>September 1, 2020</td>
<td>2018, 2019</td>
</tr>
<tr>
<td>September 1, 2022</td>
<td>2020, 2021</td>
</tr>
<tr>
<td>September 1, 2024</td>
<td>2022, 2023</td>
</tr>
<tr>
<td>September 1, 2028</td>
<td>2026, 2027</td>
</tr>
<tr>
<td>September 1, 2033</td>
<td>2031, 2032</td>
</tr>
<tr>
<td>September 1st, every five years thereafter</td>
<td>The two calendar years prior to the reporting deadline.</td>
</tr>
</tbody>
</table>
Reporting Requirements

♦ Big Box Retailer – Reports due to Executive Officer and manufacturer/private labeler
  ♦ May 1st of reporting deadline year
♦ Letter stating no sales for that year and/or indication of no future sales
  ♦ Notify SCAQMD of resumption of sales
♦ Use of 55 gal/year exemption – annual report due September 1st
  ♦ For the facility using the exemption
CARB’s Consumer Products Regulation (CPR) vs Rule 1168

- SCAQMD regulates all consumer adhesives and sealants that CPR does not
  - Health & Safety (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
- Proposing to restrict aerosol exemption
- Proposing to eliminate consumer product exemption for manufacturing at stationary sources
Regulated by CARB’s CPR

- Adhesive includes, but is not limited to: caulks; sealants; glues; or similar substances used for the purpose of forming a bond.
- Aerosol adhesive
  - Mist spray adhesive
  - Special Purpose Spray Adhesive
    - (Automobile Headliner Adhesive, Automotive Engine Compartment Adhesive)
  - Flexible Vinyl Adhesive
  - Laminate Repair/Edgebanding Adhesive
  - Mounting Adhesive
  - Polystyrene Foam Adhesive
  - Screen Printing Adhesive
  - Web Spray Adhesive
- Contact Adhesive (General Purpose, Special Purpose)
- Panel Adhesive
- Construction Adhesive
  - structural and building components that include, but are not limited to, beams, trusses, studs, paneling (drywall or drywall laminates, fiberglass reinforced plastic (FRP), plywood, particle board, insulation board, pre-decorated hardboard or tileboard, etc.), ceiling and acoustical tile, molding, fixtures, countertops or countertop laminates, cove or wall bases, and flooring or subflooring;
- Floor Covering Adhesive
  - floor or wall coverings that include, but are not limited to, wood or simulated wood covering, carpet, carpet pad or cushion, vinyl-backed carpet, flexible flooring material, nonresilient flooring material, mirror tiles and other types of tiles, and artificial grass
- General Purpose Adhesive
- Sealant or Caulking Compound
  - Chemically Curing Sealant or Caulking Compound
  - Nonchemically Curing Sealant or Caulking Compound
Excluded from CPR

- “Adhesive” does not include:
  - Products used on humans and animals
  - Adhesive tape
  - Contact paper
  - Wallpaper
  - Shelf liners
  - Any other product with an adhesive incorporated onto or in an inert substrate.
  - Adhesives designed exclusively for application on one specific category of substrates
  - Adhesives designed exclusively for use on one specific category of articles
  - “Contact Adhesive” does not include rubber cements that are primarily intended for use on paper substrates. “Contact Adhesive” also does not include vulcanizing fluids that are designed and labeled for tire repair only.

- “Construction, Panel, and Floor Covering Adhesive” does not include “Floor Seam Sealer.”

- “Sealant or Caulking Compound” does not include:
  - Pipe thread sealants or pipe joint compounds;
  - Roof cements and roof sealants;
  - Insulating foams;
  - Removable caulking compounds;
  - Clear/paintable/water resistant caulking compounds;
  - Floor seam sealers;
  - Products designed exclusively for automotive uses;
  - Sealers that are applied as continuous coatings.
Regulated by Rule 1168

- **Green** indicates product category not regulated by CPR
  - All uses fall under Rule 1168 – including consumer use
- **White** indicates product category regulated by CPR
  - Consumer use of containers under 16 fluid ounces fall under CARB
  - All use over 16 fluid ounces fall under SCAQMD
  - All use in manufacturing operations fall under SCAQMD, regardless of size
- If 1168 adopted a category prior to CPR’s adoption, 1168 VOC limit applies

### Adhesives

<table>
<thead>
<tr>
<th>Substrate Specific Adhesive Applications</th>
<th>Architectural Applications</th>
</tr>
</thead>
<tbody>
<tr>
<td>Metal</td>
<td>Building Envelope Membrane Adhesive</td>
</tr>
<tr>
<td>Plastic Foams</td>
<td>Carpet Pad Adhesive</td>
</tr>
<tr>
<td>Porous Material (except wood)</td>
<td>Ceramic Glass, Porcelain, &amp; Stone Tile Adhesive</td>
</tr>
<tr>
<td>Wood</td>
<td>Cove Base Adhesive</td>
</tr>
<tr>
<td>Fiberglass</td>
<td>Dry Wall and Panel Adhesive</td>
</tr>
<tr>
<td>Reinforced Plastic Composite</td>
<td>Multi-Purpose Construction Adhesives</td>
</tr>
<tr>
<td>Other Substrates</td>
<td>Other Indoor Floor Covering Adhesives</td>
</tr>
<tr>
<td>Other Indoor Floor Covering Adhesives</td>
<td>Other Outdoor Floor Covering Adhesives</td>
</tr>
<tr>
<td>Roofing</td>
<td>Roofing</td>
</tr>
<tr>
<td>Other Roof Adhesive</td>
<td>Other Roof Adhesive</td>
</tr>
<tr>
<td>Single Ply Roof Membrane Adhesive</td>
<td>Single Ply Roof Membrane Adhesive</td>
</tr>
<tr>
<td>Structural Glazing Adhesive</td>
<td>Structural Wood Member Adhesive</td>
</tr>
<tr>
<td>Structural Wood Member Adhesive</td>
<td>Subfloor Adhesive</td>
</tr>
<tr>
<td>VCT and Asphalt Tile Adhesive</td>
<td>VCT and Asphalt Tile Adhesive</td>
</tr>
<tr>
<td>Welding</td>
<td>ABS Welding</td>
</tr>
<tr>
<td>ABS Welding</td>
<td>ABS to PVC Transition Cement</td>
</tr>
<tr>
<td>CPVC Welding</td>
<td>CPVC Welding</td>
</tr>
<tr>
<td>PVC Welding</td>
<td>PVC Welding</td>
</tr>
<tr>
<td>All Other Plastic Cement Welding</td>
<td>All Other Plastic Cement Welding</td>
</tr>
<tr>
<td>Wood Flooring Adhesive</td>
<td>Wood Flooring Adhesive</td>
</tr>
<tr>
<td>Computer Diskette Manufacturing</td>
<td>Computer Diskette Manufacturing</td>
</tr>
<tr>
<td>Contact Adhesive</td>
<td>Contact Adhesive</td>
</tr>
<tr>
<td>Edge Glue</td>
<td>Edge Glue</td>
</tr>
<tr>
<td>Rubber Vulcanization Adhesive</td>
<td>Rubber Vulcanization Adhesive</td>
</tr>
<tr>
<td>Special Purpose Contact Adhesive</td>
<td>Special Purpose Contact Adhesive</td>
</tr>
<tr>
<td>Thin Metal Laminating</td>
<td>Thin Metal Laminating</td>
</tr>
<tr>
<td>Tire Tread</td>
<td>Tire Tread</td>
</tr>
<tr>
<td>Top and Trim Adhesive</td>
<td>Top and Trim Adhesive</td>
</tr>
<tr>
<td>Waterproof Resorcinol Glue</td>
<td>Waterproof Resorcinol Glue</td>
</tr>
<tr>
<td>All Other Adhesives</td>
<td>All Other Adhesives</td>
</tr>
</tbody>
</table>

### Sealants and Caulks

<table>
<thead>
<tr>
<th>Adhesive Primers</th>
<th>Substrate Specific Adhesive Applications</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plastic</td>
<td>Metal</td>
</tr>
<tr>
<td>Pressure Sensitive</td>
<td>Plastic Foams</td>
</tr>
<tr>
<td>Traffic Marking Tape</td>
<td>Porous Material (except wood)</td>
</tr>
<tr>
<td>Vehicle Glass</td>
<td>Wood</td>
</tr>
<tr>
<td>All Other Adhesive Primers</td>
<td>Fiberglass</td>
</tr>
<tr>
<td>Sealant Primers</td>
<td>Reinforced Plastic Composite</td>
</tr>
<tr>
<td></td>
<td>Other Substrates</td>
</tr>
<tr>
<td></td>
<td>All Other Sealants</td>
</tr>
<tr>
<td></td>
<td>All Other Architectural Applications</td>
</tr>
<tr>
<td></td>
<td>Roadway</td>
</tr>
</tbody>
</table>

**Plastic Adhesive Primers**

- Marine Deck
- Non Porous
- Porous
- All Other Sealant Primers
CPR vs Rule 1168

’exemptions

(i)(11) Consumer products (adhesives and sealants - 16 fl ounces or less that are regulated by the CPR) are exempt from the following:

- (c)(10) Storage Restriction
- (f) Administrative Requirements (reporting and labeling)
- (g) Prohibitions of Sales and Use (toxic compounds)

Rule 1168 provided they are used by household and institutional consumers or by manufacturing facilities for repair or maintenance.
CPR vs Rule 1168

◊ Exemptions: (i)(10)

◊ Aerosol regulated products that exceed the VOC limits in paragraph (c)(1) shall not be subject to the provisions of paragraph (c)(1) provided that 16 ounces (one pound) or less are used per day, per facility, as determined on a monthly basis. The use of such products shall comply with all applicable CARB regulations.

(2) SCAQMD has the authority to regulate aerosol adhesives.

The SCAQMD currently has the authority to regulate all aerosol adhesives. This authority includes the regulation of aerosol adhesives that have VOC limits specified in ARB Consumer Products Regulations, regardless of whether the adhesives are used in manufacturing or non-manufacturing operations. As you mention in your letter, Health and Safety Code section 41712(h)(3) is quite explicit that on or after January 1, 2000, local air districts have the authority to regulate aerosol adhesives:

(3) Notwithstanding any other provision of this section, on and after January 1, 2000, a district may adopt and enforce a regulation setting an emission standard or standards for VOC emissions for the use of aerosol adhesives that is more stringent than the standards adopted by the state board.
PAR 1168 Schedule

- July 6th
- July 19th
- August
- September 1st
- September 15th
- October 6th

- Comments Due
- Working Group Meeting #3
- Public Workshop
- Set Hearing
- Stationary Source Committee
- Public Hearing

Contact:
Nicole Silva
AQ Specialist
nsilva@aqmd.gov
909-396-3384