Proposed Amended Rule 1168
Adhesive and Sealant Applications

Working Group Meeting
September 19, 2013

Agenda

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

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

Preliminary Draft Rule Issues Raised

- 55 gallon/yr exemption
  - Necessary for smaller users
  - Need to address:
    - Top & Trim
    - Foam adhesives
    - Reservoir covers
    - Pressure Sensitive Adhesive Primer
    - Automotive Glass Adhesive Primer
    - Specialty Shoe Manufacturing
    - 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
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

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
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

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
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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