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Re: Follow-up Comments to July 30, 2026, meeting between South Coast AQMD and ASC - VOC Limit for Clear, Paintable, and Immediately Water-Resistant Sealants Under Rule 1168

The Adhesive and Sealant Council would like to express thanks to the staff of the South Coast Air Quality Management District for the opportunity to discuss the continuing challenges for companies to reformulate Clear, Paintable, and Immediately Water-Resistant Sealants to achieve a 250 g/L limit.

The Adhesive and Sealant Council (ASC) is a trade association representing the North American adhesive and sealant value chain. The Council is comprised of 125 adhesive and sealant manufacturers, raw material and equipment suppliers, and distributors of all sizes, representing more than 75 percent of USA industry. Offering education, legislative advocacy, professional networking, and business growth solutions to its members, the ASC is the center of knowledge and a catalyst for industry growth on a global basis for manufacturers, suppliers, and end-users.

Rule 1168 established the category of “Clear, Paintable, and Immediately Water-Resistant Sealants” (CPIWR) which is an important technology choice in the sealant market for both commercial contractors and homeowners. For example, this clear co-polymer rubber technology holds two of the top 10 best-selling sealant and caulk products offered in the hardware and lumber industry.¹ This is due to its CPIWR characteristics and recognized performance record.

¹ Industry analytics drawn from Epicor’s data on caulks and sealants.

ASC supports South Coast AQMD's objectives of reducing emissions from adhesive and sealant products. Despite thousands of research hours dedicated by the industry since 2022, no sealant manufacturer nor raw material supplier has been able to meet the 250g/L VOC limit with a product that achieves performance or use viability. To reiterate, manufacturers cannot formulate a sealant in this specific category that meets all three critical performance requirements – clarity, paintability, and immediate water resistant – while also complying with a 250 g/L VOC limit.

Between 2017 to 2022, sealant manufacturers' reformulation efforts leveraged pCBtF, the only compatible and VOC exempt aromatic solvent to reach 250 g/L limits. CPIWR sealants are based upon evaporatively curing block copolymer rubber solutions which require use of aromatic solvents for proper stability.

Based upon conversation during the July 30th meeting, we believe there is further opportunity for South Coast AQMD staff to continue industry engagement and outreach to ascertain combined technical demands of this category and identify functionally equivalent formulation pathways demonstrated at scale. This effort should include a complete technology assessment for the category of Clear, Paintable, and Immediately Water-Resistant Sealants category. This process was not conducted when South Coast AQMD created this unique category in 2017. Conducting a complete technology assessment will help clarify the distinct product differences and apparent confusion between this category and other categories referenced by South Coast AQMD staff during the July 30th meeting.

1. The category requires multiple performance attributes at the same time

These products are not conventional architectural sealants with a single primary performance claim. They must simultaneously provide a clear appearance, practical paintability, immediate resistance to water exposure, adhesion to common construction substrates, workable application properties, and durable performance. A formulation that meets only one or two of these attributes is not equivalent technology. Technical feasibility should therefore be evaluated against the full category definition and the combined performance expected by users.

2. Immediate water resistance depends on a distinct formulation approach

The volatile components used in these formulations can contribute to rapid film development, substrate wetting, application characteristics, and early resistance to moisture. They are not necessarily interchangeable with the solvents, coalescent, or other formulation tools used in lower-VOC architectural sealants. Reducing or replacing these components can delay water resistance, alter cure and paintability, create haze or loss of clarity, or reduce adhesion under real-world conditions. For this reason, a numerical comparison with other architectural sealant categories does not by itself establish technical feasibility.

3. Lower-VOC architectural sealants are not automatically equivalent

Other architectural sealants may comply with lower VOC limits because they are not required to be clear, paintable, and immediately water resistant within the same product. A product that becomes water resistant only after an extended cure period cannot be painted as intended or

does not remain clear should not be treated as a technically equivalent substitute. Market availability should be evaluated using products that satisfy all applicable claims and performance requirements simultaneously.

4. Performance losses can create unintended consequences

If reformulation compromises early water resistance or adhesion, users may experience washout, leakage, failed joints, callbacks, removal and reapplication, or additional product use. These outcomes can increase material consumption, packaging waste, transportation, and labor. A technically sound assessment should consider product durability and the potential environmental effects of rework, rather than evaluating VOC content in isolation.

5. The record supports category-specific evaluation

Rule 1168 separately identifies the clear, paintable, and immediately water-resistant sealant category and lists a 250 g/L VOC limit. South Coast AQMD's technology-assessment materials also explain that market penetration, sales-weighted VOC information, manufacturer feedback, and product availability are relevant indicators of technical feasibility. We encourage the district to apply those same indicators specifically to products that meet every defining attribute of this sealant category.

This unique category for CPIWR Sealants was created by South Coast AQMD. A VOC limit for this category should reflect technical feasibility, in accordance with South Coast AQMD requirements. The 250 g/L limit established by South Coast AQMD does not reflect technical feasibility. Industry research since 2022 has identified a path forward to achieve a 340-350 g/L level that will enable companies to manufacture products that meet the definition of Clear, Paintable, and Immediately Water-Resistant Sealant in Rule 1168, as revised 10-04-2022.

The Adhesive and Sealant Council continues to commit to providing South Coast AQMD with industry technical and scientific expertise and knowledge to identify solutions that meet South Coast AQMD policy objectives and provide the public with sealant products that meet customer needs and performance requirements.

We would be glad to facilitate a meeting with South Coast AQMD after staff has had an opportunity to review the above information and recommendations.

Respectfully yours,

A handwritten signature in blue ink, appearing to read "W E Allmond".

William E. Allmond
President