



Rule 1168 – Adhesive and Sealant Applications

Public Workshop

September 30, 2026

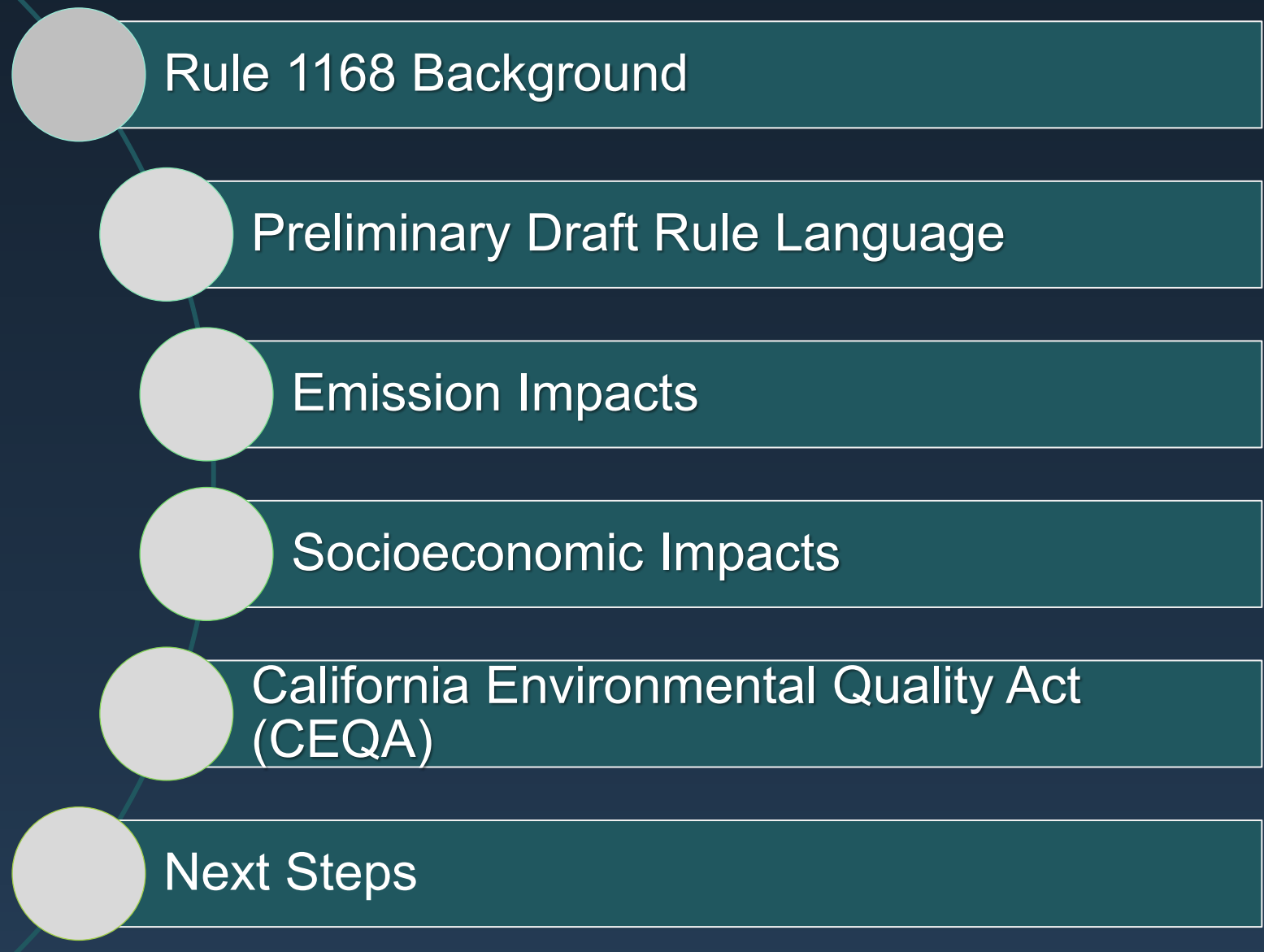
9:00 AM (PST)

Join zoom meeting:

<https://aqmd.zoomgov.com/j/1658914403>

Meeting ID: 165 891 4403

Agenda



Rule 1168 Background

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2022 Rule 1168 Amendment

- Established prohibition timeline for *para*-Chlorobenzotrifluoride (pCBtF) and tert-butyl acetate (t-BAc)
- Required Technology Check-in to ensure reformulation efforts were successful

Technology Check-In conducted in November 2025 indicated:

- Roofing adhesive primers will need additional time to phase-out of pCBtF
 - Low-solids and heavily reliant on pCBtF for compliance (up to 70% in formulation)
 - Current phase out date is January 1, 2027
 - Reformulation has been challenging

Other Areas of Concern Identified:

- Future-effective lower volatile organic compound (VOC) limits for three categories with upcoming or past deadlines:
 - Clear, Paintable, and Immediately Water-Resistant Sealants
 - Rubber Vulcanization Adhesives
 - Top and Trim

Rule 1168 Applicability

- Rule 1168 establishes volatile organic compounds (VOC) content limits for adhesives and sealants
 - **Table 1** – Product Categories and VOC Content Limits
- Rule 1168 also establishes pCBtF and t-BAc prohibition timelines

Table 1 – Regulated Product Categories and VOC Limits

Category	VOC Limits (g/L unless otherwise indicated) ¹			Future Effective Date
	Current Limit	Limit Effective 1/1/2023	Limit at Future Effective Date	
Adhesives				
Architectural Applications				
Building Envelope Membrane Adhesive	250			
Carpet Pad Adhesive	50			
Ceramic Glass, Porcelain, & Stone Tile Adhesive				
Cove Base Adhesive				
Dry Wall and Panel Adhesive				
Multi-Purpose Construction Adhesives				
Roofing				
Hot Applied Modified Bitumen/Built Up Roof Adhesive				
EPDM/TPO Single Ply Roof Membrane Adhesive				
Single Ply Roof Membrane Adhesive (Except EPDM/TPO)				
Shingle Laminating Adhesive				
All Other Roof Adhesives				
Rubber Floor Adhesive				
Structural Glazing Adhesive				
Structural Wood Member Adhesive				
Subfloor Adhesive				
VCT and Asphalt Tile Adhesive				
Wood Flooring Adhesive				
All Other Indoor Floor Covering Adhesives				
All Other Outdoor Floor Covering Adhesives				

Table 3: pCBtF and t-BAc Prohibition Timeline

Category	Prohibition Effective Date	Sell-through End Date	Use-through End Date
pCBtF Prohibition Effective Dates			
Cut Edge Single Ply Roof Membrane Sealant	January 1, 2027	January 1, 2028	January 1, 2028
EPDM/TPO Single Ply Roof Membrane Adhesive			
Roof Adhesive Primer			
Single Ply Roof Membrane Adhesive (Except EPDM/TPO)	January 1, 2025	January 1, 2028	January 1, 2028
Single Ply Roof Membrane Sealant (Except Cut Edge)			
All Other Roof Sealant			
Roof Sealant Primer	January 1, 2026	January 1, 2028	January 1, 2028
Clear, Paintable, and Immediately Water-Resistant Sealant			
All Regulated Products not listed above	January 1, 2024	January 1, 2027	January 1, 2028
t-BAc Prohibition Effective Dates			
All Regulated Products	January 1, 2024	January 1, 2027	January 1, 2028

Proposed Amendments

1

Provide additional time to phase out pCBtF from roof adhesive primers

2

Provide additional reformulation time to meet future-effective lower VOC limits for three categories

3

Remove the existing 55-gallon exemption

4

Updates to reporting and record keeping requirements

5

Propose additional toxic compound prohibitions





Provide additional time to phase out pCBtF from Roof Adhesive Primer

Roof Adhesive Primer

Provide additional reformulation time by extending the future effective phase-out dates for pCBtF to meet the existing VOC content limit

- Three-year extension to Jan. 1, 2030

Establish alternative PW-MIR reactivity-based VOC limits for Roof Adhesive Primer

- Challenging to reformulate without pCBtF

2

Provide additional reformulation time to meet future-effective lower VOC limits for three categories

Provide Additional reformulation time to meet future effective lower VOC limits

- Clear, paintable, and immediately water-resistant (Jan. 1, 2028)
- Rubber Vulcanization (Jan. 1, 2029)
- Top and Trim (Jan. 1, 2030)

Also establish alternative PW-MIR VOC limit for

- Top and Trim Adhesive

3 Removing the existing 55-gallon exemption

Proposing
to sunset
exemption
effective

January 1,
2028

No annual reports have been received from facilities
utilizing this exemption

Alternative compliant products exist in every
category

4

Updates to reporting and record keeping requirements

Clarified QER reporting responsibilities for manufacturers, private labelers, and big box retailers

Distributors are no longer required to submit QERs and must only maintain and provide records upon request

- Big box retailers continue reporting as before

Manufacturers and private labelers must continue to report total annual quantities sold and distributed

Including sales to retailers, distributors, and big box retailers

Phase out the 55-gallon exemption after calendar year 2027

- The final report due September 1, 2028.

New requirements for manufacturers/private labelers to provide distributor lists and for distributors to maintain five years of annual sales records.

5 Propose additional toxic compound prohibitions

Volatile methyl siloxanes (VMS) are classified as Group II Exempts but not prohibited from use in Rule 1168

- Group II compounds are restricted due to toxicity or other environmental impacts

Risks associated with VMS

- U.S. EPA preliminary evaluation indicated VMS poses unreasonable risk for certain uses
- OEHHA identified non-cancer chronic toxic endpoint impacting the liver and spleen

VMS can be found in some silicone-based sealants as an impurity, not as a main component

- Proposing a higher-level allowance, considering 0.1 weight percent
 - Aligns with other recently adopted rules
- Include a future effective date, considering January 2028

5 Propose additional toxic compound prohibitions

In 2009, the U.S. EPA exempted DMC from the definition of a VOC due to negligible photochemical reactivity

- Due to known toxicity concerns, South Coast AQMD did not exempt DMC

Staff is concerned that alternative PW-MIR limits provide an incentive for manufacturers to reformulate from pCBtF to DMC-based adhesives and sealants

Staff is considering prohibiting DMC

- Prohibit at 0.01 weight percent, with a January 2028 future effective date

Preliminary Draft Rule Language

Overall Updates

- Revised VOC content limits for certain
- Revised pCBtF prohibition timeline for one category
- Added two alternative reactivity-based VOC limits
- Restructured minor provisions for consistency
- No major changes made to overall rule structure

Proposed Amended Rule 1168

- (a) Purpose
- (b) Applicability
- (c) Definitions
- (d) Requirements
- (e) Reporting and Recordkeeping Requirements
- (f) Test Methods
- (g) Administrative Requirements
- (h) Prohibition of Sales and Use
- (i) Rule 442 Applicability
- (j) Exemptions

Definitions (C)

- Added new definitions for clarity
- Revised existing definitions for greater clarity

Added 9 new definitions

- Battery Adhesive
- Chemical Abstracts Service Registration Number (CAS RN)
- Distributor
- Executive Officer
- Manufacturer
- Maximum Incremental Reactivity (MIR)
- Product Weighted MIR (PW-MIR)
- Retail Outlet
- South Coast AQMD Test Method

Revised 10 definitions

- Big Box Retailer
- Cove Base Adhesive
- Edge Glue Adhesive
- Exempt Compounds
- Regulatory VOC
- Material or Actual VOC
- High-Pressure Two Component Foam Sealant
- High-Volume, Low-Pressure (HVLP) Spray
- Potable Water Sealant
- Special Purpose Contact Adhesive

Definitions (C) (continued)

- Added new Battery Adhesive definition since a new category added
- Added CAS RN definition as the rule uses CAS RN to clearly identify pCBtF and t-BAc
- Updated Distribution Center to Distributor for clarity

(12) BATTERY ADHESIVE is an adhesive used to bond or seal components within a battery assembly, engineered to maintain integrity when exposed to battery operating conditions, including chemical, thermal, and mechanical stresses.

(18) CHEMICAL ABSTRACTS SERVICE REGISTRATION NUMBER or CAS RN means a unique numerical identifier assigned by the Chemical Abstracts Service to a single chemical substance to ensure unambiguous identification.

~~(28) DISTRIBUTION CENTER is a warehouse or other specialized building, which is stocked with products (goods), to be redistributed to retailers, wholesalers, or directly to end-users.~~

(30) DISTRIBUTOR means any Person to whom Regulated Product are sold or supplied for the purposes of resale or distribution in commerce, except that Manufacturers, Retail Outlets, and consumers are not Distributors.

Definitions (C) (continued)

- Revised Edge Glue Adhesive for consistency
- Added Executive Officer definition for clarity and consistency with other South Coast AQMD rules
- Revised Exempt Compounds definition for clarity

(3032) EDGE GLUE ADHESIVE is an adhesive applied to the edge of multi-sheet carbonless forms prior to being fanned apart after drying.

(35) EXECUTIVE OFFICER is as defined in Rule 102 – Definition of Terms.

(3336) EXEMPT COMPOUNDS are as defined in Rule 102—~~Definition of Terms (Rule 102)~~, including Group I and Group II Exempt Compounds. For the purpose of this rule, Opteon 1100 (cis-1,1,1,4,4,4-hexafluoro-2-butene/HFO-1336mzz-Z) shall only be considered exempt as a VOC for High-Pressure Two-Component Foam Sealants and Low-Pressure Two-Component Foam Sealants when used in an industrial or professional setting by workers trained with procedures and guidelines to reduce potential risk of exposure, if the Office of Environmental Health Hazard Assessment has sufficient information to conduct a toxicity assessment and, upon completion of its assessment:

Definitions (C) (continued)

- Revised Regularity VOC definition for clarity and consistency with other South Coast AQMD rules

(3942) GRAMS OF VOC PER LITER (g/L) OF REGULATED PRODUCT, LESS WATER AND LESS EXEMPT COMPOUNDS or REGULATORY VOC is the weight of VOC per combined volume of VOC and product solids, and can be calculated by the following equation:

~~Grams of VOC per Liter of Regulated Product, Less Water and Less~~

$$\text{Exempt Compounds} \text{Regulatory VOC} = \frac{\cancel{W_s} W_v - W_w - \cancel{W_{es}} W_{ex}}{V_m - V_w - \cancel{V_{es}} V_{ex}}$$

Where: $\cancel{W_s}$ = weight of volatile compounds, in grams (includes water, Exempt Compounds, and VOCs);
 $\cancel{W_{es}}$ = weight of ~~exempt compounds~~ Exempt Compounds, in grams;
 $\cancel{V_{es}}$ = volume of ~~exempt compounds~~ Exempt Compounds, in liters.
 W_v = weight of water, in grams;
 W_w = weight of water, in grams;
 W_{ex} = weight of ~~exempt compounds~~ Exempt Compounds, in grams;
 V_m = volume of material, in liters;
 V_w = volume of water, in liters;
 V_{ex} = volume of ~~exempt compounds~~ Exempt Compounds, in liters.

Definitions (C) (continued)

- Revised Material or Actual VOC definition for clarity and consistency with other South Coast AQMD rules

(4043) GRAMS OF VOC PER LITER OF MATERIAL OR ACTUAL VOC is the weight of VOC per volume of material, to be used for a Low-Solids product, and can be calculated by the following equation:

$$\text{Grams of VOC per Liter of Material} \text{ Actual VOC } = \frac{W_s W_v - W_w - W_{es} W_{ex}}{V_m}$$

Where: W_s = weight of volatile compounds, in grams (includes water, Exempt Compounds, and VOCs);
 W_v =
 W_w = weight of water, in grams;
 W_{es} = weight of ~~exempt—compounds~~ Exempt Compounds, in grams;
 W_{ex} =
 V_m = volume of material, in liters.

For reactive products, the VOC content is determined after curing.

Definitions (C) (continued)

- Revised existing high-pressure two component definition for clarity
- Added manufacturer definition to help clarify responsibility of revised reporting requirements
- Added new MIR definition to reflect new alternative compliance option

(4346) HIGH-PRESSURE TWO-COMPONENT FOAM SEALANT is a foam sealant packaged as two containers and applied using a propellant system that is pressurized to greater than or equal to 250 pounds per square inch (psi).

(54) MANUFACTURER means any Person, company, firm, or establishment who imports, manufactures, blends, assembles, produces, packages, repackages, or re-labels any Regulated Product. The Manufacturer listed on the product's label shall be primarily responsible for compliance with applicable provisions of this rule. If the label lists two or more Manufacturers, they may mutually designate in writing a Manufacturer responsible for compliance with this rule. That writing shall be filed with the Executive Officer.

(59) MAXIMUM INCREMENTAL REACTIVITY (MIR) means the measure of the photochemical reactivity of a VOC, which estimates the weight of ozone produced from a weight of VOC expressed as gram of ozone per gram of VOC (g O₃ /g VOC). MIR values for individual VOCs are specified in Title 17, California Code of Regulations Sections 94700 and 94701.

Definitions (C) (continued)

- Revised Potable Water definition for clarity
- Added new PW-MIR definition to clarify how to determine PW-MIR value if manufacturers elect to comply with new alternative PW-MIR limits in Table 2 of rule

(7479) POTABLE WATER ~~ARCHITECTURAL~~-SEALANT is a sealant used in water treatment or water distribution applications required to comply with National Sanitation Foundation (NSF)/American National Standards Institute (ANSI) Standard 61: Drinking Water System Components – Health Effects.

(82) PRODUCT-WEIGHTED MIR (PW-MIR) means the sum of all weighted MIR for all ingredients in a product. The PW-MIR is the total product reactivity expressed to hundredths of a gram of ozone formed per gram of product (excluding container and packaging) and calculated according to the following equations:

Weighted MIR (Wtd-MIR) ingredient = MIR × Weight Fraction ingredient and

$PW-MIR = (Wtd-MIR)_1 + (Wtd-MIR)_2 + \dots + (Wtd-MIR)_n$

Where:

MIR = ingredient MIR; and

1, 2, 3...n = each ingredient in the product up to the total n ingredients in the product.

Definitions (C) (continued)

- Added definition for Retail Outlet to clarify new reporting requirements in rule
- Added definition of South Coast AQMD test method for consistency with other South Coast rules
- Revised existing definitions for clarity

(90) RETAIL OUTLET means any establishment at which a Regulated Product ~~are~~ is sold, supplied, or offered for sale directly to consumers.

(105) SOUTH COAST AQMD TEST METHOD means a test method included in the manual of “Laboratory Methods of Analysis for Enforcement Samples,” which can be found on the South Coast AQMD website and are referenced in subdivision (f).

(~~98~~106) SPECIAL PURPOSE CONTACT ADHESIVE is a contact adhesive that is used to bond all of the following substrates to any surface: melamine covered board, metal, unsupported vinyl, ~~Teflon~~ Polytetrafluoroethylene,

Requirements (d)

- Updated Table 1 to reflect the VOC limits that became effective on January 1, 2023 for 11 subcategories
- Added new Battery Adhesive category to address reformulation timeline

Table 1 – Regulated Product Categories and VOC [Content](#) Limits

Category	VOC Limits (g/L unless otherwise indicated) ¹			Future Effective Date
	Current Limit ²	Limit Effective 1/1/2023	Limit at Future Effective Date	
Adhesives				
Architectural Applications				
Building Envelope Membrane Adhesive	250			
Carpet Pad Adhesive	50			
Ceramic Glass, Porcelain, & Stone Tile Adhesive	65			
Cove Base Adhesive	50			
Dry Wall and Panel Adhesive	50			
Multi-Purpose Construction Adhesives	70			
Roofing				
Hot Applied Modified Bitumen/Built Up Roof Adhesive	~~250~~ 30	30		
EPDM/TPO Single Ply Roof Membrane Adhesive	250			
Single Ply Roof Membrane Adhesive (Except EPDM/TPO)	250			
Shingle Laminating Adhesive	~~250~~ 30	30		
All Other Roof Adhesives	250			
Rubber Floor Adhesive	60			
Structural Glazing Adhesive	100			
Structural Wood Member Adhesive	140			
Subfloor Adhesive	50			
VCT and Asphalt Tile Adhesive	50			
Wood Flooring Adhesive	~~100~~ 20	20		
All Other Indoor Floor Covering Adhesives	50			
All Other Outdoor Floor Covering Adhesives	50			
Battery Adhesive	120			
Computer Diskette Manufacturing Adhesive	350			
Contact Adhesive	80			

Requirements (d)

- Extended lower VOC limit effective dates for three categories
 - Rubber Vulcanization Adhesive
 - Top and Trim Adhesive
 - Clear, Paintable, and Immediately Water-Resistant Sealant

Table 1 – Regulated Product Categories and VOC Content Limits

Category	VOC Limits (g/L unless otherwise indicated) ¹			Future Effective Date
	Current Limit ²	Limit Effective 1/1/2023	Limit at Future Effective Date	
Adhesives				
Rubber Vulcanization Adhesive	850		250	~~1/1/2028~~ <u>1/1/2029</u>
Special Purpose Contact Adhesive	250			
Thin Metal Laminating Adhesive	780			
Tire Tread Adhesive	100			
Top and Trim Adhesive	540		250	~~1/1/2028~~ <u>1/1/2030</u>
Sealants				
Architectural Applications				
Clear, Paintable, and Immediately Water-Resistant Sealant	380		250	~~1/1/2026~~ <u>1/1/2028</u>
Foam Insulation	~~250~~ <u>5%</u> ³	~~5%~~ ²		

Requirements (d)

- Added a new product category for battery adhesive to Table 1 of the rule to allow time for testing and recertification of pCBtF-free battery adhesives

Table 1 – Regulated Product Categories and VOC Content Limits

Category	VOC Limits (g/L unless otherwise indicated) ¹			Future Effective Date
	Current Limit ²	Limit Effective 1/1/2023	Limit at Future Effective Date	
Adhesives				
Wood Flooring Adhesive	~~100~~ <u>20</u>	20		
All Other Indoor Floor Covering Adhesives	50			
All Other Outdoor Floor Covering Adhesives	50			
<u>Battery Adhesive</u>	<u>120</u>			
Computer Diskette Manufacturing Adhesive	350			
Contact Adhesive	80			

Requirements (d)

- New Alternative PW-MIR limit to for two adhesive categories in Table 2
 - Roof Adhesive Primers
 - Top and Trim Adhesives

(2) Alternative PW-MIR VOC Content Limits

In lieu of complying with the Table 1 Regulatory VOC content limits, a Person may manufacture, supply, sell, offer for sale, market, distribute, package, or repackage any Roof Adhesive Primer or Top and Trim Adhesive for use within South Coast AQMD, that complies with the Alternative PW-MIR VOC limit in Table 2 – Alternative PW-MIR VOC Limits.

Table 2 – Alternative PW-MIR VOC Limits

<u>Category</u>	<u>g O₃/g Product</u>
<u>Roof Adhesive Primer</u>	<u>0.65</u>
<u>Top and Trim Adhesive</u>	<u>0.60</u>

Reporting and Recordkeeping Requirement (e)

- Subdivision (e) updated to clarify that Manufacturers and private labelers are required to report QER data to South Coast AQMD
- Subparagraph (e)(1)(G) clarifies that manufacturers and private labelers must report all quantities sold to retail outlets, big box retailers, and distributors

(G) Total annual ~~volume~~quantity of each product distributed or sold into or within the South Coast AQMD for use in the South Coast AQMD; The annual quantity of each product shall ~~including~~ include products sold to Retail Outlets, Distributors, and through Big Box Retailers with ~~Distribution Center~~ Distributors located within or outside the South Coast AQMD, reported in gallons for all container sizes; and

Reporting and Recordkeeping Requirement (e)

- Paragraph (e)(4) updated and requires only big box retailers to submit QERs.
- Distributors are only required to maintain records and must be made available upon request

(4) Big Box Retailer ~~or Distribution Center~~ QER

A ~~big box retailer~~ Big Box Retailer ~~or distribution center~~ shall submit a QER to the Executive Officer and Regulated Product ~~manufacturer~~ Manufacturer or ~~private labeler~~ Private Labeler, according to the schedule in Table ~~23~~ and maintain records to verify all required data being reported for three years and make them available upon request by the Executive Officer. The QER must be electronically submitted, in a spreadsheet format and certified that all information reported is true and correct. The QER must contain the following information:

- (A) The ~~manufacturer~~ Manufacturer or ~~private labeler~~ Private Labeler's product name and code; and
- (B) The quantity of each Regulated Product, aerosol adhesive, and aerosol adhesive primer distributed into the South Coast AQMD.

Reporting and Recordkeeping Requirement (e)

- The 55-gallon exemption in paragraph (e)(6) will be phased out beginning January 1, 2028
- No facility has submitted an annual report under the 55-gallon exemption

(6) Facilities Using the 55-Gallon Exemption

For each calendar year (January 1 through December 31), through calendar year 2027, an owner or operator of a Facility using or purchasing Regulated Products under the provisions of paragraph ~~(j)(5)(C)~~(j)(11) shall submit to the South Coast AQMD by September 1st of the following calendar year, an annual report of Regulated Product used or purchased under the provisions of paragraph ~~(j)(5)(C)~~(j)(11) within the South Coast AQMD and maintain records to verify all required data being reported for three years from the date the report is submitted and make them available upon request by the Executive Officer. The final report required by this paragraph shall be submitted no later than September 1, 2028. The report shall include the

Reporting and Recordkeeping Requirement (e)

- Paragraph (e)(7) added to provide to the Executive Officer a list of distributors in which manufacturers and private labelers supply their products to
- Aligns with Rule 1113 and will assist rule implementation
- Staff plans to remove (e)(7)(C) in draft rule

(7) On or before January 1st of each calendar year, all Manufacturers and Private Labelers subject to this rule shall provide to the Executive Officer:

(A) A list of all their U.S. Distributors to whom they supply Regulated Products, including but not limited to Private Labeler and toll manufactured products and shall include the Distributor's name, address, contact person, and phone number;

(B) Details or copies of any written notification provided to an independent Distributor pursuant to paragraph (j)(10); and

~~(C) The information in subparagraphs (e)(7)(A) and (e)(7)(B) shall be in a format determined by the Executive Officer.~~

Reporting and Recordkeeping Requirement (e)

- Paragraph (e)(9) establishes new recordkeeping requirement for distributors selling products within the South Coast AQMD
- Distributors are now required to maintain records of all annual sales for five years and made available upon request
- Distributors were previously required to report to the manufacturer and South Coast AQMD

(9) Distributors shall maintain records of all annual sales of Regulated Products into and within the South Coast AQMD. The records shall be maintained for five years and made available upon request by the Executive Officer.

Test Methods (h)

- Test methods subdivision restructured to streamline and align with structure of similar South Coast AQMD rules

- (B) VOC content may be determined by [South Coast AQMD Test Method 304](#) ~~– (Determination of Volatile Organic Compounds (VOC) in Various Materials) in the South Coast AQMD's "Laboratory Methods of Analysis for Enforcement Samples" manual.~~;
- (C) Exempt compound content shall be determined by [South Coast AQMD Test Method 303](#) ~~– Determination of Exempt Compounds in the South Coast AQMD's "Laboratory Methods of Analysis for Enforcement Samples" or ASTM Method D4457.~~;
- (D) VOC content may be determined by [South Coast AQMD Test Method 313](#) ~~– (Determination of Volatile Organic Compounds VOC by Gas Chromatography-Mass Spectrometry) in the South Coast AQMD's "Laboratory Methods of Analysis for Enforcement Samples" manual.~~;
- (E) VOC content may be determined by ASTM Test Method [D6886](#) ~~– (Standard Test Method for Determination of the Weight Percent Individual Volatile Organic Compounds in Waterborne Air-Dry Coatings by Gas Chromatography).~~;
- (F) The VOC content of PVC, CPVC, ABS, ABS to PVC Transition Welding Cements, and plastic adhesive primers shall be determined by [South Coast AQMD Test Method 316A](#) ~~in the South Coast~~

Administrative Requirements (g)

- Paragraph (g)(10) establishes labeling requirements for manufacturers or private labelers that elect to comply with the alternative PW-MIR limits in Table 2

(10) Each container of regulated product that elects to comply with the alternative PW-MIR VOC limits in paragraph (d)(2), shall include the PW-MIR VOC content in g O₃ /g product displayed on the label.

Prohibition of Sales and Use (h)

- Paragraph (h)(1) revised to include a prohibition for VMS and DMC
- Updated pCBtF and t-BAC prohibition
- Added pCBtF prohibition for new category battery adhesive

(h) Prohibition of Sales and Use

(1) ~~Except as provided in subdivision (j), no~~ No person Person shall use, supply, sell, ~~or~~ offer for sale, distribute, package, repack, or possess a Regulated Product for use within the South Coast AQMD that contains more than any of the following chemicals in concentrations greater than the following limits:

(A) 0.01 percent by weight of ~~the following chemicals:~~ chloroform, ethylene dichloride, methylene chloride, perchloroethylene, trichloroethylene, or Group II exempt compounds. ~~This provision does not apply to~~ excluding cyclic, branched, or linear, completely methylated siloxanes (VMS):;

(2) ~~Prohibition of tertiary-Butyl Acetate (t-BAC and para-Chlorobenzotrifluoride (pCBtF)~~
~~On and after the prohibition effective dates specified in Table 3, no person shall manufacture a Regulated Product for sale into or within the South Coast AQMD or supply, sell, offer for sale or use a Regulated Product in the South Coast AQMD that contains more than~~

(B) 0.1 percent by weight of VMS that was manufactured after the applicable Table 4 –Prohibition Timeline Final Manufacture Date;

(C) 0.01 percent by weight of either ~~para-Chlorobenzotrifluoride~~ (pCBtF, CAS RN 98-56-6), or tert-Butyl Acetate (t-BAC, CAS RN 540-88-5), or dimethyl carbonate (DMC, CAS RN 616-38-6) that was manufactured after the applicable Table 4 Final Manufacture Date for Regulated Products other than Battery Adhesives; or

(D) For a Battery Adhesive:

(i) 1.0 percent by weight of pCBtF that was manufactured on and before the applicable Table 4 Final Manufacture Date; and

(ii) 0.01 percent by weight of pCBtF or t-BAC that was manufactured after the applicable Table 4 Final Manufacture Date.

Prohibition of Sales and Use (h)

- Added Paragraph (h)(2) to clarify the sell-through and use-through provisions
- Previously only listed in Table 4

(2) Sell Through and Use Through Provision

Any Regulated Product that is manufactured prior to the applicable Table 4 Final Manufacture Date, that contains more than the applicable limits in paragraph (h)(1), may be sold, supplied, or offered for sale until the applicable Table 4 Sell-Through Date and may be possessed, used, or solicited for use until the applicable Table 4 Use-Through Date.

Prohibition of Sales and Use (h)

- Revised Table 4 prohibition timeline for roof adhesive primer
- Added prohibition timeline for new battery adhesive category
- Added prohibition timelines for DMC and VMS

Table 34: pCBtF and t-BAc Prohibition Timeline

Category	Prohibition Effective Date <u>Final Manufacture Date</u>	Sell-through <u>Through End Date</u>	Use-through <u>Through End Date</u>
pCBtF Prohibition Effective Dates			
<u>Roof Adhesive Primer</u>	<u>January 1, 2030</u>	<u>January 1, 2031</u>	<u>January 1, 2031</u>
<u>Battery Adhesive</u>	<u>January 1, 2029</u>	<u>January 1, 2030</u>	<u>January 1, 2031</u>
Cut Edge Single Ply Roof Membrane Sealant	January 1, 2027	January 1, 2028	January 1, 2028
EPDM/TPO Single Ply Roof Membrane Adhesive			
~~Roof Adhesive Primer~~	~~January 1, 2027~~	~~January 1, 2028~~	~~January 1, 2028~~
Single Ply Roof Membrane Adhesive (Except EPDM/TPO)	January 1, 2025	January 1, 2028	January 1, 2028
Single Ply Roof Membrane Sealant (Except Cut Edge)			
All Other Roof Sealant			
Roof Sealant Primer			
Clear, Paintable, and Immediately Water-Resistant Sealant	January 1, 2026	January 1, 2028	January 1, 2028
All Regulated Products not listed above	January 1, 2024	January 1, 2027	January 1, 2028
t-BAc Prohibition Effective Dates			
All Regulated Products	January 1, 2024	January 1, 2027	January 1, 2028
<u>DMC and VMS Prohibition Effective Dates</u>			
<u>All Regulated Products</u>	<u>January 1, 2028</u>	<u>January 1, 2029</u>	<u>January 1, 2030</u>

Exemptions (j)

- Removing the 55-gallons exemption as of January 1, 2028
- No facility has reported using subparagraph (j)(5)(c)

~~(C) — A Facility that demonstrates that the total volume of noncompliant products is less than 55 gallons per facility per calendar year. A Facility may not use this paragraph to exclude noncompliant adhesives used in architectural applications; contact adhesives; special purpose contact adhesives; adhesives used on porous substrates; rubber vulcanization adhesives and top and trim adhesives; or~~

Exemptions (j)

- Paragraph (j)(10) allows manufacturers to supply non-compliant product to a distributor within the South Coast AQMD provided they notify the distributor that the product cannot be used within the South Coast AQMD
- Revised provision to require manufacturer to supply that written notification to the South Coast AQMD
- Removed reference to toxic compound prohibition subdivision

(10) The provisions of paragraph (d)(1) ~~and subdivision (h)~~ shall not apply to any ~~manufacturer~~ Manufacturer or Private Labeler ~~supplier of Regulated Products~~—provided the ~~product~~ Regulated Product was sold to an independent ~~distributor~~ Distributor that was informed in writing by the Manufacturer or Private Labeler, including electronic formats, ~~by the manufacturer or supplier~~, that the Regulated Product is not to be used in the South Coast AQMD. Manufacturers and Private Labelers utilizing this provision shall comply with the reporting requirement pursuant to subparagraph (e)(7)(B) and maintain notification letters for ~~three~~ five years, ~~which shall be made available to the Executive Officer or designee upon request.~~

Exemptions (j)

- Revised paragraph (j)(11) to remove the 55-gallon exemption effective January 1, 2028
- Facilities electing to use the 55-gallon exemption until that date must continue to comply with the reporting requirements in paragraph (e)(6)

(11) Until January 1, 2028, the provisions of paragraph (d)(1) shall not apply to a Facility that demonstrates that the total volume of noncompliant products is less than 55 gallons per facility per calendar year provided the Facility complies with the reporting and recordkeeping requirements in paragraph (e)(6). A Facility may not use this paragraph to exempt adhesives used in architectural applications; contact adhesives; special purpose contact adhesives; adhesives used on porous substrates; rubber vulcanization adhesives and top and trim adhesives from the provisions of paragraph (d)(1).

Emission Reductions

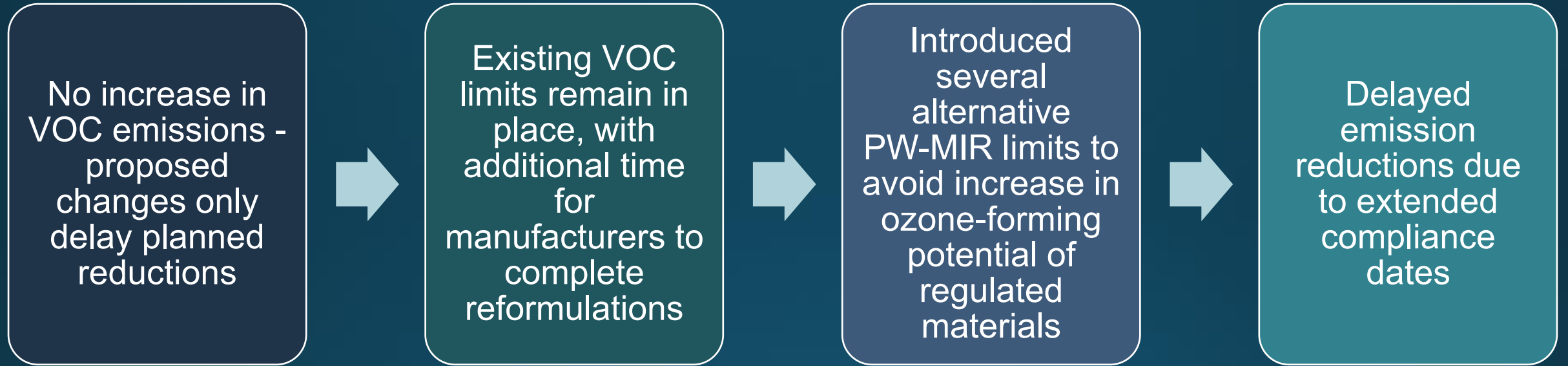


Table 4-1: Delayed Emission Reductions (tpd)

Category	Delayed Emission Reductions (tpd)	Date
Top and trim adhesive	0.115	1/1/12030
Rubber vulcanization adhesive	0.020	1/1/2029
Clear, paintable, immediately water-resistant sealant	0.011	1/1/2028
Total	0.146	

Socioeconomic Impacts and California Environmental Quality Act (CEQA)

Socioeconomic Impact Assessment

- Assessment will consider:
 - Types of affected industries, including small businesses
 - Range of probable costs, including costs to industry or business
- Preliminary analysis indicates an overall cost savings because:
 - Extended compliance timelines expected to reduce near-term compliance costs by providing manufacturers additional time to reformulate
 - Fewer reformulations and associated costs expected if manufacturers elect to rely on alternative PW-MIR VOC content limit
 - Staff is unaware of any current formulations which contain VMS and DMC - prohibition not expected to result in significant costs
- Draft Socioeconomic Impact Assessment will be released for public review and comment at least 30 days prior to the Governing Board Hearing, which is scheduled for December 4, 2026 (subject to change)

California Environmental Quality Act (CEQA)

- South Coast AQMD is CEQA lead agency for PAR 1168
- Draft Subsequent Environmental Assessment (SEA) prepared which tiers off of:
 - Final Environmental Assessment for the October 2017 amendments to Rule 1168; and
 - Final SEA for the November 2022 amendments to Rule 1168
- Potentially significant air quality impacts expected due to delayed VOC emission reductions to allow manufacturers more time to reformulate
- Draft SEA released for a 46-day public review and comment period from September 18, 2026 to November 3, 2026

Next Steps

Written Comments Requested by October 9, 2026



Stationary Source Committee October 16, 2026



Set Hearing on November 6, 2026



Public Hearing on December 4, 2026

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