

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

Preliminary Draft Staff Report

Proposed Amended Rule 1168 – Adhesive and Sealant Applications

September 2026

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EXECUTIVE SUMMARY

Rule 1168 was adopted in April 1989 to control volatile organic compound (VOC) emissions from adhesive and sealant applications. The rule has been amended 15 times; the last rule amendment was in November 2022 and included a phase-out schedule for *para*-chlorobenzotrifluoride (pCBtF) and *tert*-Butyl Acetate (t-BAc) which have been determined to be carcinogenic by the Office of Environmental Health Hazard Assessment (OEEHA). Rule 1168 regulates and establishes VOC limits for 69 categories of adhesives, adhesive primers, sealants, and sealant primers. Rule 1168 applies to products used during manufacturing at stationary sources as well as products used by consumers that are not regulated by the California Air Resources Board (CARB) in the Consumer Products Regulation (CPR)^[1].

The proposed amendments to Rule 1168 began as a result of the technology check-in that was included in the 2022 amendment to assess the progress of the pCBtF and t-BAc phase out. As a result of the technology check-in, staff concluded that roof adhesive primers required more time for reformulation. Staff also reached out to manufacturers to assess the reformulation progress for three categories of adhesives and sealants with upcoming VOC limit reductions.

Staff initiated the rule development process in June 2026 to address the additional time needed to meet the January 2027 proposed pCBtF prohibition for roof adhesive primers. Further meetings with additional manufacturers and industry representatives identified three more categories that require additional time to comply with future-effective lower VOC limits. The three additional categories identified are: top and trim adhesives; rubber vulcanization adhesives; and clear, paintable, and immediately water-resistant sealants. Staff is proposing to delay the pCBtF prohibition timeline for roof adhesive primers and the future-effective lower VOC limit timelines for top and trim adhesives; rubber vulcanization adhesives; and clear, paintable, and immediately water-resistant sealants. The proposed timeline of the extension dates are:

- Roof adhesive primers pCBtF phase out, January 1, 2030
- Top and trim adhesive VOC limit reduction, January 1, 2030
- Rubber vulcanization adhesive VOC limit reduction, January 1, 2029
- Clear, paintable, and immediately water-resistant sealants VOC limit reduction, January 1, 2028

Staff is also proposing to include an alternative equivalent PW-MIR limit for roof adhesive primers and top and trim adhesives; phase out the exemption that allows facilities to use 55 gallons of non-compliant products per year; require manufacturers to provide a list of their distributors annually; transition reporting to recordkeeping requirement for distributors; addition of a new category for battery adhesives; and provide clarifications, updates to definitions, and cross references to maintain consistency with other South Coast AQMD rules.

This rule amendment will result in delayed emission reductions and toxic reductions due to technical feasibility and reformulation challenges. The estimated rule inventory is approximately 9 tons per day (tpd) of VOC. The projected delayed emission reductions from the proposed amendments are 0.146 tpd of VOC emissions. Extending the pCBtF prohibition date for roof adhesive primers will delay the benefit of reducing the use of and exposure to pCBtF, a known carcinogen.

^[1]The California Consumer Products Regulations; https://ww2.arb.ca.gov/sites/default/files/2020-08/v3_ADA_Regs-all_8-31-2020.pdf

CHAPTER 1 : BACKGROUND

INTRODUCTION

REGULATORY HISTORY

AFFECTED INDUSTRIES

PUBLIC PROCESS

Introduction

Rule 1168 was adopted in April 1989 to control VOC emissions from adhesive applications. The rule has been amended 15 times; the last amendment was in November 2022. The rule applies to products that were used during manufacturing at stationary sources and to products used by consumers that were not regulated by the CARB in the CPR. Rule 1168 currently regulates and establishes VOC limits for 69 categories of adhesives, adhesive primers, sealants, and sealant primers.

Regulatory History

In the 2017 rule amendment, the resolution directed staff to conduct a technology check-in in 2022 to evaluate the feasibility of several future effective VOC limit reductions. During the 2022 technology check-in, staff identified the need to amend the rule to provide additional time for product reformulation. As part of this effort, staff also chose to address the emerging toxicity concerns associated with pCBtF and t-BAc.

The 2022 amendment was the first rule to consider and change the status of two exempt or partially exempt compounds: pCBtF and t-BAc. pCBtF is considered exempt from the definition of VOC for all use within the South Coast Air Quality Management District (South Coast AQMD), including Rule 1168 products, whereas t-BAc is only exempt in a few South Coast AQMD rules. Rule 1168 included a phase-out schedule for pCBtF and t-BAc and through extensive discussions with stakeholders, staff determined that certain roofing product categories would require additional time to transition to formulations that do not rely on either exempt compound. Based on these findings, the South Coast AQMD Governing Board adopted a resolution committing staff to conduct a technology check-in to evaluate the progress of the pCBtF and t-BAc phase-out and report back to the Stationary Source Committee by January 2026. Staff determined rule amendment is necessary to address reformulation challenges for the pCBtF phase out in roof adhesive primers.

The primary goal of the current rule development is to delay the pCBtF phase out date for roof adhesive primers. In addition, staff is proposing to delay the future effective VOC limit reductions for two adhesive and one sealant categories with upcoming VOC limit reductions, and add a new category for battery adhesives due to formulation challenges. The proposal also includes alternative reactivity-based limits for two challenging categories; removal of an existing exemption at a future-effective date; and clarification of reporting requirements for manufacturers.

Background on t-BAc and pCBtF

In 1994, the U.S. EPA exempted pCBtF from the definition of a VOC, and in 1995, South Coast AQMD added pCBtF as an exempt VOC compound in Rule 102. A Rule 102 VOC exemption means pCBtF is not considered a VOC for any application in the South Coast AQMD.

In 2004, U.S. EPA similarly exempted t-BAc; however, South Coast AQMD did not grant a full exemption under Rule 102 due to toxicity concerns, instead allowing limited exemptions through source-specific rules such as Rule 1113.

In 2013, amendments to Rule 1113 directed staff to re-evaluate the t-BAc exemption based on emerging health concerns. In 2017, staff presented preliminary findings on t-BAc and pCBtF to

the Stationary Source Committee (SSC), and the SSC subsequently directed staff to remove t-BAC exemptions following completion of OEHHA's health risk assessment and to evaluate pCBtF for potential carcinogenicity.

OEHHA finalized the t-BAC health risk assessment in 2018, concluding that its cancer risk was higher than previously estimated, and finalized the pCBtF assessment in 2020, identifying pCBtF as a potential carcinogen. In response, South Coast AQMD has taken action to prohibit these compounds through amendments to Rule 1168 in 2022, Rule 1151 in 2024, Rule 1171 and 1107 in 2025, and Rules 1144 and 1136 in 2026.

Affected Industries

Adhesive and sealant use subject to the rule spans a wide range of industries that have miscellaneous uses during manufacturing. The industry sectors that make extensive use of products subject to this rule include¹:

- Adhesive Manufacturing (NAICS 325520)
- Air-Conditioning and Warm Air Heating Equipment and Commercial and Industrial Refrigeration Equipment Manufacturing (NAICS 333415)
- All Other Rubber Product Manufacturing (NAICS 326299)
- Asphalt Shingle and Coating Materials Manufacturing (NAICS 324122 and 325520)
- Commercial and Institutional Building Construction (NAICS 236220)
- Custom Architectural Woodwork and Millwork Manufacturing (NAICS 337212)
- Drywall and Insulation Contractors (NAICS 238310)
- Flooring Contractors (NAICS 238330)
- Footwear Manufacturing (NAICS 316210)
- Glass and Glazing Contractors (NAICS 238150)
- Hardwood Veneer and Plywood Manufacturing (NAICS 321211)
- Household Furniture (except Wood and Metal) Manufacturing (NAICS 337125)
- Industrial Building Construction (NAICS 236210)
- Manufactured Home (Mobile Home) Manufacturing (NAICS 321991)
- Motor Vehicle Seating and Interior Trim Manufacturing (NAICS 336360)
- New Multifamily Housing Construction (except For-Sale Builders) (NAICS 236116)
- New Single-Family Housing Construction (except For-Sale Builders) (NAICS 236115)
- Office Furniture (except Wood) Manufacturing (NAICS 337214)
- Oil and Gas Pipeline and Related Structures Construction (NAICS 237120)

¹ NAICS Association from <http://www.naics.com/index.html>

- Other Millwork (including Flooring) (NAICS 321918)
- Plumbing, Heating, and Air-Conditioning Contractors (NAICS 238220)
- Polystyrene Foam Product Manufacturing (NAICS 326140)
- Residential Remodelers (NAICS 236118)
- Roofing Contractors (NAICS 238160)
- Rubber Product Manufacturing for Mechanical Use (NAICS 326291)
- Showcase, Partition, Shelving, and Locker Manufacturing (NAICS 337215)
- Siding Contractors (NAICS 238170)
- Surgical Appliance and Supplies Manufacturing (NAICS 339113)
- Tile and Terrazzo Contractors (NAICS 238340)
- Tire Retreading (NAICS 326212)
- Urethane and Other Foam Product (except Polystyrene) Manufacturing (NAICS 326150)
- Water and Sewer Line and Related Structures Construction (NAICS 237110)
- Wood Container and Pallet Manufacturing (NAICS 321920)
- Wood Kitchen Cabinet and Countertop Manufacturing (NAICS 337110)
- Wood Window and Door Manufacturing (NAICS 321911)
- Paint and Wallpaper Stores (NAICS 444120)

Public Process

The rule amendment process for PAR 1168 began in June 2026. Staff conducted two Working Group Meetings and held multiple individual meetings with manufacturers and distributors. The table below summarizes the key topics discussed at each of the Working Group Meetings; presentations from those meetings are posted on the South Coast AQMD's website.²

² <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules/rule-1168>

Table 1-1: Working Group Meetings

Meeting title	Date	Highlights
Technology Check In	November 18, 2025	• Summary of stakeholder meetings • Technology check-in process
Working Group Meeting #1	July 8, 2026	• Rule background • Key amendment objectives
Working Group Meeting #2	August 26, 2026	• Proposed amendments and timelines extensions • Other rule considerations
Public Workshop	Scheduled for September 30, 2026	• Proposed amended rule including updated VOC limits and revised effective dates

Staff also met with industry stakeholders and their representatives throughout the rule development process. Table 1-2 below summarizes stakeholder meetings during the rulemaking:

Table 1-2: Meetings with Stakeholders

Date	Stakeholder
October 15, 2025	Single-Ply Roofing Industry (SPRI)
October 17, 2025	Johns Manville
November 17, 2025	Carlisle Construction Materials (CCM)
June 25, 2026	DAP Global Inc.
June 25, 2026	R.D. Abbot Co.
July 30, 2026	Adhesive and Sealant Council (ASC)
September 3, 2026	Concorde Battery Corporation

CHAPTER 2 : TECHNOLOGY ASSESSMENT

TECHNOLOGY CHECK-IN

PROPOSED TIMELINES

OTHER PROPOSED CHANGED TO THE RULE

Technology Check-In

During the 2022 rule amendment, the Governing Board directed staff to assess the progress of the pCBtF and t-BAc phase-out and to report back to the Stationary Source Committee. As part of this effort, the technology check-in included meetings with manufacturers, review of data reported by an industry trade group, and additional stakeholder feedback relevant to the transition away from pCBtF and t-BAc.

Staff met with roofing industry stakeholders as part of the technology check-in process. These meetings included discussions with the Single-Ply Roofing Industry (SPRI) on October 15, 2025, followed by a meeting with a manufacturer on October 17, 2025, and another manufacturer meeting with Carlisle CCM on November 14, 2025. Stakeholders did not identify phase-out concerns for most roofing adhesive and sealant categories, with the exception of Ethylene Propylene Diene Monomer (EPDM) roofing adhesive primers, which may require additional time for reformulation. For the majority of products, the phase-out had already been implemented. The remaining products were undergoing testing prior to commercial release.

Product-Weighted Maximum Incremental Reactivity (PW-MIR) Compliance Pathway

A key component of the amended rule is the introduction of an optional PW-MIR compliance pathway for two categories. PW-MIR is a reactivity-based metric that reflects the ozone-forming potential of a product based on the weighted reactivity of all VOC ingredients in the formulation.

Under PAR 1168, PW-MIR limits are established only for roof adhesive primers and top and trim adhesives. These limits were derived through equivalency analyses to ensure that compliance using PW-MIR achieves an ozone impact comparable to compliance with existing mass-based VOC limits. The PW-MIR pathway is optional and does not replace or modify the existing VOC content limits.

MIR values used to calculate PW-MIR are published by CARB and represent the relative ozone-forming potential of individual VOCs. PW-MIR is calculated by weighting each VOC's MIR value by its proportion in the product formulation, resulting in a single metric that represents the overall ozone-forming potential of the product. This approach allows the rule to distinguish between VOCs with substantially different reactivities rather than treating all VOCs equally on a mass basis.

This approach provides manufacturers with additional reformulation flexibility by allowing substitution of lower-toxicity VOCs with known reactivity characteristics, rather than relying on exempt solvents. By maintaining existing VOC limits and offering PW-MIR as an alternative pathway, the rule avoids backsliding while supporting feasible transitions away from toxic exempt compounds.

The PW-MIR framework has been used in prior South Coast AQMD rulemakings, including Rules 1151, 1171, and 1136, to support equivalent or greater ozone protection while providing flexibility during reformulation. Consistent with those rules, PW-MIR under PAR 1168 is offered as an alternative compliance option and is designed to achieve equal or lower ozone formation compared to traditional mass-based VOC limits.

This layered compliance framework balances public health protection with technical feasibility, allowing transition away from toxic exempt solvents and VOC reductions while maintaining product performance and regulatory compliance.

EPDM/TPO Roofing Adhesive Primer

EPDM roofing adhesive primers are low-use specialty coatings, but serve as a critical component of EPDM roofing systems. These products are typically formulated as low-solids coatings that rely on a high percentage of pCBtF to meet the current 250 g/L VOC limit. At this time, no EPDM roofing adhesive primer has been reported as being formulated without pCBtF.

Staff continued engagement with manufacturers and trade associations to assess progress in developing compliant, non-pCBtF EPDM roofing adhesive primers. Since reformulation efforts did not demonstrate sufficient progress, staff considered extending the pCBtF phase-out for this specialty category and considered alternative equivalent PW-MIR limits for this category.

Thermoplastic Olefin (TPO) roofing adhesive primers are high-solvent-content primers used to achieve the necessary bond strength in TPO roofing systems. These primers meet the current VOC limits through the use of high levels of pCBtF, typically ranging from 40 to 70 percent of the formulation.

Staff reviewed EPDM/TPO Roofing Adhesive Primers sold in South Coast AQMD, and based on manufacturer submitted data, staff is proposing a PW-MIR of 0.65 g O₃/g of product for this category.

Table 2-1: PW-MIR Limit for Roofing Adhesive Primer

Category	PW-MIR (g O ₃ /g of product)
Roof adhesive primer	0.65

To allow time for manufacturers to comply with the proposed PW-MIR VOC limit, staff is recommending extending the pCBtF prohibition timeline for three years to January 1, 2030.

Table 2-2: Revised Prohibition Date for Roofing Adhesive Primer

Category	Prohibition Effective Date	Sell-through End Date	Use-through End Date
Roof adhesive primer	January 1, 2027 January 1, 2030	January 1, 2028 January 1, 2031	January 1, 2028 January 1, 2031

Other Rule 1168 Categories

During the rule amendment process, staff also evaluated upcoming VOC limit reductions. As part of this evaluation, staff met with adhesive manufacturers to assess the status of reformulation efforts for categories with upcoming VOC reductions, including top and trim adhesives, rubber vulcanization adhesives, and Clear, Paintable, and Immediately Water-Resistant Sealants. These discussions provided insight into manufacturers' progress, technical challenges, and anticipated timelines for transitioning to lower-VOC or non-pCBtF formulations.

Top and trim adhesives

In 2007, the VOC limit for this product category was reduced from 540 g/L to 250 g/L. However, manufacturers reported technical challenges that prevented reformulation to meet the lower limit. As a result, end users continued to rely on high-VOC products under the 55-gallon-per-year exemption allowed in the rule.

During the 2017 rule amendment, staff reinstated the 540 g/L limit through 2023 based on manufacturer feedback indicating that progress was being made toward achieving the 250 g/L limit. This temporary reinstatement was intended to provide additional time for reformulation while ensuring continued product availability.

On January 1, 2019, the 55-gallon-per-year exemption expired for the category, further emphasizing the need for compliant low-VOC formulations.

In 2021 and 2022, staff conducted the required technology assessment to determine whether the 250 g/L limit would be feasible by 2023. The assessment concluded that a rule amendment was necessary due to reformulation challenges. Based on these findings, the compliance deadline for achieving the 250 g/L VOC limit was extended to January 1, 2028.

On June 25, 2026, staff met with a stakeholder to discuss the phase-out process and evaluate progress in developing compliant reformulations. Initial stakeholder feedback indicated that a low-VOC, water-based contact adhesive has been successfully developed and performs well in many applications. However, manufacturers reported that the product did not pass critical top-and-trim performance tests required for automotive use, and that water-based systems are unable to provide the high-heat-resistant properties needed for certain applications. Based on this feedback, stakeholders indicated that an extended timeline is necessary to meet the 250 g/L.

Staff reviewed top and trim adhesives sold in South Coast AQMD and evaluated additional data provided by manufacturers. Based on this review, staff determined that a PW-MIR of 1.00 g O₃/g product is equivalent to the current 540 g/L VOC limit. Using PW-MIR values applied in comparable rules with a 250 g/L VOC limit, staff proposes a PW-MIR of 0.60 g O₃/g product for this category.

Table 2-3: PW-MIR Limit for top and trim adhesive

Category	PW-MIR (g O ₃ /g of product)
Top and trim adhesive	0.60

The current rule establishes a top and trim VOC limit of 250 g/L, effective January 1, 2028. Given ongoing reformulation challenges and the absence of compliant products, staff is proposing to extend the compliance timeline by two years, to January 1, 2030.

Table 2-4: Revised Future Effective Date for Top and Trim

Category	Current Limit (g/L)	Limit at Future Effective Date	Future Effective Date
Top and trim adhesive	540	250	1/1/2028 1/1/2030

Rubber vulcanization adhesives

Prior to 2017, the VOC limit for this category was set at 250 g/L; however, most facilities complied using the 55-gallon exemption rather than reformulating products to meet the lower VOC limit.

During the 2017 rule amendment, the 55-gallon exemption was removed, and the VOC limit was raised to 850 g/L to reflect existing product formulations. The 250 g/L limit was retained as a future effective limit to allow manufacturers additional time to complete necessary reformulation work.

In 2022, stakeholders requested reconsideration of the future 250 g/L limit due to ongoing reformulation challenges. Based on stakeholder feedback and available product data, staff retained the 850 g/L limit as the current requirement and provided an additional five years for reformulation to support the development of compliant products.

On June 25, 2026, staff met with stakeholders to evaluate progress on reformulating rubber vulcanization adhesives to meet the future effective 250 g/L VOC limit. Initial stakeholder feedback indicated that rubber vulcanization adhesives are highly specialized products that vary significantly depending on the specific use case, with each formulation uniquely developed for a particular application. Stakeholders reported that product development had been temporarily halted due to an incident at a manufacturing plant, which slowed progress on reformulation efforts. Manufacturers also noted that next-generation water-based technologies are currently being evaluated but are still in the early stages of testing.

Stakeholder follow-up on reformulation progress indicated that three compliant water-based products are currently in development; however, not all applications will be fully tested and ready by January 1, 2028, due to ongoing technical challenges associated with reformulating this product category. Additional time will be necessary to meet the current VOC limit.

Based on this information, staff is proposing to extend the compliance timeline by one year, to January 1, 2029.

Table 2-5: Revised Future Effective Date for rubber vulcanization adhesive

Category	Current Limit (g/L)	Limit at Future Effective Date	Future Effective Date
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Rubber vulcanization adhesive	850	250	1/1/2028 1/1/2029
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Clear, paintable, and immediately water-resistant sealants

Before 2017, this product category was included within the broader “Architectural Sealant” category. During the 2017 amendment, a new subcategory—Clear, paintable, and immediately water-resistant sealant—was created with a 380 g/L VOC limit. Stakeholders indicated that the product provides immediate water resistance, allowing rapid sealing during rain or snow conditions. Staff noted, however, that other Architectural Sealants that comply with the 250 g/L VOC limit also provide immediate water resistance; the distinction lies in these products being “clear” and then also “paintable.”

In 2017, the stakeholder requested additional time to reformulate products to meet the future 250 g/L limit. During the 2022 rule amendment, the stakeholder again requested additional time due to ongoing technical challenges. The compliance deadline was extended to January 1, 2026, providing approximately eight years for reformulation.

The majority of clear, paintable, and immediately water-resistant Sealants are used for architectural applications; some are used as roofing sealants. The 250 g/L VOC limit went into effect January 1, 2026; however, sell-through and use-through for products manufactured before January 1, 2026 are allowed until January 1, 2028.

Staff met with the Adhesive and Sealant Council on July 30, 2026, a national trade group representing North American adhesive and sealant manufacturers, raw material suppliers, equipment suppliers, and distributors. The trade group claimed products in this category have not successfully been reformulated to meet the 250 g/L VOC limit. Reformulation efforts had been initiated with pCBtF; however, pCBtF is no longer a viable option. Staff noted that Clear, Paintable, Immediately Water-Resistant Sealants were reported in manufacturer Quantity and Emissions Reports (QERs) at VOC levels around 50 g/L, indicating that some manufactures have successfully reformulated these types of sealants.

Clear, paintable, and immediately water-resistant sealants are used across both architectural and roofing applications. Approximately 66 percent of use occurs in architectural settings, including sinks, bathtubs, and windows. The Architectural Sealant category has a VOC limit of 50 g/L, and many products already meet this limit. While these products are not immediately water-resistant, this property is generally less critical for architectural applications. While these products are not both clear and paintable, as previously stated, those characteristics do not justify the extremely high VOC levels of the products.

The remaining 34 percent of use occurs in roofing applications, where the sealants are used for flashing, vent pits, and ductwork. Roofing Sealants have a VOC limit of 300 g/L, and many products meeting this limit, including those that provide immediate water resistance, are available. While compliant roofing sealants may not be both “clear” and then also “paintable,” those characteristics are even less relevant when used on a roof, where the opacity and paintability are even less relevant.

The need for this high VOC category carve out is not clear when there are many low-VOC sealants available. The South Coast AQMD is in extreme non-compliance for ground level ozone; therefore, emission reductions are crucial. Architectural sealants with VOC levels under 50 g/L are commercially available and widely used. It is difficult to justify a high VOC category to be carved out at 380 g/L for a sealant that is clear but then is obscured by paint, or is paintable when low-VOC sealants tinted to color match any installation are widely available. At the time of the category carve out, architectural sealants had a 250 g/L limit, and the manufacturers committed to lowering the clear, paintable, and immediately water-resistant sealant VOC content down to 250 g/L, but that has not been achieved. Now that architectural sealants can comply with a 50 g/L VOC limits, these high VOC products need to be reformulated or eliminated from this air basin.

Staff is recommending one additional VOC limit reduction delay for the Clear, Paintable, and Immediately Water-Resistant Sealant category, which was established in 2017, by approximately one year from the date of rule adoption to January 1, 2028. Multipurpose water-resistant sealants that meet the 50 g/L VOC limit are commercially available, and some products have been reported with VOC levels below 50 g/L. In addition, non-clear or paintable water-resistant outdoor roofing sealants that meet the 300 g/L VOC limit are also commercially available.

Summary of the proposed timelines

Tables below show the summary of proposed revised timelines for the four categories.

Table 2-6: Proposed Revised Timelines for VOC Limits Effective Date

Category	Proposed Date
Clear, paintable, and immediately Water-Resistant Sealant	January 1, 2028
Rubber vulcanization adhesives	January 1, 2029
Top and trim adhesives	January 1, 2030

Table 2-7: Proposed Revised Timelines for pCBtF Prohibition, sell-through, and use-through date

Category	Final Manufacturer Date	Sell-Through Date	Use-Through Date
Roof adhesive primers	January 1, 2030	January 1, 2031	January 1, 2031

Other Considerations

Quantity and Emission Reports

As part of the proposed amendments, staff is also proposing updates to the Quantity and Emissions Report (QER) requirements to streamline reporting, improve data quality, and ensure consistency with similar provisions in Rules 1113 and 314. These changes are intended to address gaps in current reporting, reduce ambiguity, and strengthen the completeness and accuracy of product data submitted to the South Coast AQMD.

To improve alignment with Rules 1113/314 and enhance data quality, staff is proposing revisions to the QER requirements. Although Rule 1168 contains similar reporting provisions, staff has determined that not all manufacturers are reporting adhesives and sealants when products are sent through distributors rather than sold directly. The proposed change will ensure that all products sold directly to retailers or distributors, including those distributed through big box retailers, are included in annual QER submissions. This approach is consistent with Rule 314/1113, which requires big box retailers to report sales volumes to both the South Coast AQMD and the architectural coatings manufacturer, including products distributed through centers inside or outside the South Coast AQMD. The manufacturers rely on those big box reports to ensure their Rule 314 annual sales volumes reflect what is sold at big box retail outlets.

Rule 1168 currently requires reporting of “total annual volume sold into or within the South Coast AQMD,” including products distributed through centers located inside or outside the South Coast AQMD; however, the South Coast AQMD primarily relies on manufacturers to provide complete information. To improve accuracy and eliminate gaps, staff is proposing to amend the rule to clarify that manufacturers must report:

- All sales to retailers who directly sell products within the South Coast AQMD
- All sales to distributors located within the South Coast AQMD
- All sales information reported back to manufacturers by big box retailers

In addition, manufacturers will be required to submit a list of distributors to support verification of reporting completeness. Distributors would be required to maintain records but would not be required to report their sales to the South Coast AQMD. This change will avoid duplication, double counting, and unnecessary administrative burden. Manufacturers will be primary source of quantity and emissions data.

Staff also proposes redefining and updating the definition of “distribution centers” to “distributors” to ensure it refers to midstream distributors and not retailers that sell directly to end users.

Some QER submissions currently include ambiguous or outdated category names (e.g., reporting generic “adhesives” without specifying the correct adhesive subcategory), which results in incorrect classification and complicates data validation, reporting, and trend analysis. To address these inconsistencies, staff is introducing standardized Rule 1168 category codes in reporting templates. These codes will eliminate ambiguity, improve accuracy, and ensure consistent and reliable data across reporting cycles.

55-gallons Exemption

In addition to proposed timeline amendments and updates to the QER reporting requirements, staff is also recommending changes to the existing 55-gallon exemption in Rule 1168. The exemption was originally adopted to allow facilities limited use of non-compliant products when compliant formulations were not yet commercially available. As product reformulation has progressed and VOC limits have been updated over time, staff has reassessed the need for this provision as part of the current rule amendment.

Currently, facilities may use up to 55 gallons per year of non-compliant products. Historically, facilities relied on this exemption for top and trim adhesives and rubber vulcanization adhesives because compliant formulations were not available. In 2017, staff increased the VOC limits for

these categories and required facilities to report any use of the exemption. Since that time, staff is not aware of any adhesives or sealants that cannot meet current VOC limits, and no annual reports have been received from facilities utilizing the exemption. Compliant products now exist in every category, but the continued availability of the exemption has led manufacturers to cite it as justification for selling non-compliant products into the South Coast AQMD.

Given the lack of reported use, the availability of compliant products, and the potential for misuse, staff is proposing to sunset the 55-gallon exemption effective January 1, 2028. Eliminating this provision will eliminate a potential loophole that allows the sale of non-compliant products into and within the South Coast AQMD.

Independent Distributor Exemption

Another consideration in this rule amendment is the existing independent distributor exemption. Under the current provision, manufacturers and suppliers are exempt from the prohibition to sell non-compliant products provided they notify independent distributors in writing that the products may not be used within the South Coast AQMD.

Manufacturers have reported selling large quantities of non-compliant adhesives and sealants into the South Coast AQMD citing this exemption. Staff's review of written notices provided by manufacturers to distributors indicates that the notifications often lack specificity and may not clearly communicate that the products cannot be used within the South Coast AQMD. This increases the potential for misuse and creates enforcement ambiguity.

Given these concerns, staff is proposing to require manufacturers to provide the written notification they provide to distributors to the South Coast AQMD. In addition, similar to the requirements in Rule 314, staff is proposing to require manufacturers to submit a list of their distributors to the Executive Officer before January 1st of each calendar year.

CHAPTER 3 : SUMMARY OF PROPOSALS

INTRODUCTION

PROPOSED AMENDED RULE STRUCTURE

PROPOSED AMENDED RULE 1168

Introduction

The main objective of the proposed amendments to Rule 1168 is to extend the pCBtF prohibition date for roofing adhesive primers to allow additional time for reformulation; extend future-effective VOC limit reductions for two adhesive categories and one sealant category; introduce alternative reactivity-based limits for categories with significant reformulation challenges; sunset the 55-gallon exemption that allows limited use of non-compliant products; and clarify manufacturer reporting requirements to improve data quality and consistency. The proposed revised rule structure and key provisions are discussed in the following sections.

Proposed Amended Rule Structure

- (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*

Proposed Amended Rule 1168

Definitions [Subdivision (c)]

To provide clarity, definitions are used in the proposed amended rule as a proper noun to better distinguish defined terms from common terms. Refer to PAR 1168 for a complete list of definitions. New definitions were added to clarify applicability and requirements. Revised timeline for categories are discussed later in subdivision (d).

The following are new and modified definitions for PAR 1168. For all definitions, refer to the preliminary draft of PAR 1106 released with the Staff Report. Accordingly, the following definitions will be added

Refer to PAR 1168 for a complete list of definitions. The following are new or revised definitions for PAR 1168:

The definition for battery adhesive is added to address pCBtF prohibition and phase-out challenges.

“BATTERY ADHESIVE means 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 stress.”

The definition for chemical abstracts service registration number or CAS RN is added to provide clarification.

“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’.

The definition of Distribution Center has been revised to Distributors for consistency with other South Coast AQMD rules.

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

The definition for Manufacturer is added to provide clarification.

“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.”

The definitions for maximum incremental reactivity (MIR) and definition for product-weighted MIR (PW-MIR) are added to support the introduction of reactivity-based compliance options.

“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.”

“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.”

The definition for Retail Outlet is added to provide clarification.

“RETAIL OUTLET means any establishment at which Regulated Product are sold, supplied, or offered for sale directly to consumers.”

The following definitions are added for clarification.

“EXECUTIVE OFFICER is as defined in Rule 102 – Definition of Terms.”

“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).”

The following list of definitions are revised for clarification without changing the original intent.

- Big-box retailer
- Cove base adhesive
- Edge glue adhesive

- High-pressure two component foam sealant
- Private labeler
- Potable water sealant
- Rubber floor adhesive
- Special purpose contact adhesive

The Regulatory and Material (Actual) VOC definitions have been revised for consistency with other South Coast AQMD rules.

Requirements [Subdivision (d)]

This subdivision contains the provisions for any person that uses or stores any adhesives, adhesive primers, sealants, or sealant primers conducting operations in the South Coast AQMD and applies to any person who sells, offers for sale, markets, blends, distributes, packages, repackages, or supplies marine or pleasure craft and marine structure coatings.

This provision sets the requirements for VOC limits and effective dates for adhesives and sealants by categories and subcategories, as summarized in Rule 1168 Table 1 – Regulated Product Categories and VOC Limits. Staff is proposing a revision to Rule 1168 Table 1 to reflect the VOC limits that became effective dates January 1, 2023 for 11 subcategories. Staff is also proposing to provide additional time and extend the lower VOC limit effective dates for three categories:

- Top and trim adhesive
- Clear, paintable, and immediately water-resistant sealant
- Rubber vulcanization adhesive

A new product category for battery adhesive was added to Table 1 of the rule to allow time for testing and recertification of pCBtF-free battery adhesives used at a local manufacturing facility. Battery adhesives are currently subject to the “all other adhesive” category and have a VOC content limit 250 g/L. The newly added battery adhesives category will have a more stringent VOC content limit of 120 g/L and will not result in any potential VOC emissions increase. The concern related to this battery adhesive category is related to pCBtF reformulation and not VOC limit related. The future effective prohibition date was added to Table 3 – pCBtF and t-BAC Prohibition timeline of the rule in subdivision (h).

The following table provides a summary of the proposed changes and updates to Table 1 in Rule 1168. New changes to the table include: the addition of the revised effective dates for Top and Trim and rubber vulcanization adhesive categories; addition of one new category for battery adhesive along with an associated VOC limit; updating VOC limit for 17 adhesive and sealant categories which became effective on January 1, 2023. This change to the 17 categories was to clean up and streamline the table with existing VOC limits that became effective and is not a lowering of the VOC limits.

Table 3-1: Summary of Table 1 Revisions

Category	Current Limit	Limit at Future Effective Date	Effective Date
Adhesives			
Top and Trim Adhesive	540 g/L	250 g/L	1/1/2030
Rubber Vulcanization Adhesive	850 g/L	250 g/L	1/1/2029
Battery Adhesive	120 g/L		
Wood Flooring Adhesive	20 g/L		1/1/2023
Roofing Adhesive			
Hot Applied Modified Bitumen/Built Up Roof Adhesive	30 g/L		1/1/2023
Shingle Laminating Adhesive	30 g/L		1/1/2023
Plastic Welding Cement			
CPVC Welding Cement	400 g/L		1/1/2023
CPVC Welding Cement for Life -Safety Systems	400 g/L		1/1/2023
ABS to PVC Transition Cement	425 g/L		1/1/2023
PVC Welding Cement	425 g/L		1/1/2023
Sealants			
Foam Insulations	5%		1/1/2023
One-Component Foam Sealant	18%		1/1/2023
High-Pressure Two-Component Foam Sealant	5%		1/1/2023
Low-Pressure Two-Component Foam Sealant	5%		1/1/2023
Non-Staining Plumbing Putty	50 g/L		1/1/2023
Clear, Paintable, and Immediately Water-Resistant Sealant	380 g/L	250 g/L	1/1/2028
All Other Sealants	250 g/L		1/1/2023
Roofing Sealants			
Single Ply Roof Membrane Sealant (Except Cut Edge)	250 g/L		1/1/2023
Cut Edge Single Ply Roof Membrane Sealant	250 g/L		1/1/2023

Additionally, staff is proposing an alternative PW-MIR limit to paragraph (d)(2) for two adhesive categories, roof adhesive primers and top and trim adhesives to address potential reformulation challenges for the two categories. The alternative PW-MIR limits are equivalent to the current mass-based limits for the respective category. Please see Table 3-2 below for a summary of the proposed PW-MIR limits.

Table 3-2: Summary of Alternative PW-MIR limits

Category	PW-MIR Limit (g O ₃ /g Product)
Roof adhesive primer	0.65
Top and trim adhesive	0.60

Reporting and Recordkeeping Requirements [Subdivision (e)]

Rule 1168 includes two specific recordkeeping provisions. Manufacturers, big box retailers, and distributors must retain records to support the data reported in the QERs; owners or operators of stationary sources that use adhesives or sealants to manufacture products must maintain records pursuant to Rule 109 – Recordkeeping for Volatile Organic Compound Emissions. The current rule specifies reporting and recordkeeping under separate subdivisions (f) and (d) and it is not specific that Rule 109 only applies to stationary sources.

Staff proposes to clarify and update recordkeeping and reporting requirements for manufacturers, private labelers, big box retailers, and distributors. The key change is that distributors are now only required to maintain records and make them available upon request. Big box retailers are required to report volume sold to the manufacturer and to South Coast AQMD, that is not a change; staff also clarified the definition of distributor in subdivision (c) - definitions section of the rule.

The 55-gallon exemption in paragraph (e)(6) will be phased out beginning January 1, 2028 to align with the next upcoming reporting cycle in 2028. Paragraph (e)(6) now establishes that the 55-gallon exemption is now valid through calendar year 2027. Beginning January 1, 2028, the 55-gallon exemption is no longer available to facilities. Historically, no facility has reported to South Coast AQMD that they are using the exemption, so the exemption is no longer necessary and will be phased out. For any facility electing to use the 55-gallon exemption until the phase out effective date of January 1, 2028, the reporting date of September 1 of the following calendar has not changed. The provision also establishes a requirement that the final report must be submitted no later than September 1, 2028.

Subparagraph (e)(1)(G) was revised to clarify that manufacturers and private labelers must report the total annual quantity of each product sold and “distributed” within the South Coast AQMD not just products sold by the manufacturer. The provision also clarifies that the annual quantity of each product sold must include those products that are sold to retail outlets, distributors, through big box retailers.

Paragraph (e)(7) is a new provision which establishes a requirement for manufacturers and private labelers to provide to the Executive Officer a list of their U.S. distributors in which they supply their products. The provision also specifies the type of information that must be submitted which includes name, address, contact person, phone number, and copies of any written notifications provided to an independent distributor such as notices stating that any product not complying with the rule limits cannot be sold within South Coast AQMD. These new requirements are necessary to prevent potential rule circumvention.

Paragraph (e)(9) establishes a new requirement for distributors that sell products within the South Coast AQMD. Distributors are now required to maintain records of all annual sales for five years

and must be made available to the executive officer upon request. Distributors or distribution centers along with big box retailers were previously required to directly report QERs to the manufacturers and private labelers pursuant to paragraph (e)(4). Distributors are now only required to maintain records and must be made available upon request to the Executive Officer.

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

The Table below shows the QER reporting schedule adopted during the 2017 amendment. “Big Box Retailers and Distribution Centers” in the heading has been changed to “Big Box Retailers: to provide clarity who must report. There is no change to the actual reporting date or timelines.

Table 3-3: QER Reporting Schedule

Reporting Deadlines		Reported Years
Manufacturers & Private Labelers	Big Box Retailers	
September 1, 2019	May 1, 2019	2017, 2018
September 1, 2022	May 1, 2022	2020, 2021
September 1, 2025	May 1, 2025	2023, 2024
September 1, 2030	May 1, 2030	2028, 2029
September 1, 2035	May 1, 2035	2033, 2034
September 1, 2040	May 1, 2040	2038, 2039

Test Methods [Subdivision (f)]

Staff is not proposing any major changes to this provision. This subdivision was streamlined for consistency with recently adopted VOC rule amendments

Administrative Requirements [Subdivision (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 – Alternative PW-MIR VOC Limit in paragraph (d)(2) of the rule.

Prohibition of Sale and Use [Subdivision (h)]

Currently the rule prohibits the sale and use of regulated products that contain chloroform, ethylene dichloride, methylene chloride, perchloroethylene, and trichloroethylene and all Group II exempt solvents except volatile methyl siloxanes (VMS). Small, but non-negligible, quantities of VMS are widely used in silicone-based sealants. The Group II exempt solvent prohibition was included during the 2017 amendments, and it included an effective date of January 1, 2019. PAR 1168 prohibit the use of t-BAC and pCBtF under subdivision (h). This proposal is based on staff’s assessment of t-BAC and pCBtF health risk and the Stationary Source Committee’s direction to take a precautionary approach when considering expanding or including an exemption for any

compound with a toxic endpoint. The proposal also includes a sell-through and use-through provision for products manufactured prior to the effective date of the t-BAC and pCBtF prohibition. Sell-through and use-through provision are already included in Rule 1168 when there is a VOC limit change for a Regulated Product. Based on stakeholder feedback and evaluation during the technology check-in conducted, staff proposes to delay the pCBtF prohibition for roof adhesive primers from January 1, 2027 to January 1 2030 and delay the sell-through and use-through dates from January 1, 2028 to January 1, 2031. Additionally, staff also added a new category to Table 4 of the rule for battery adhesives with a prohibition effective date of January 1, 2029, a sell-through date of January 1, 2030 and use-through date of January 1, 2031. The prohibition delay for the two categories and future-effective prohibition date for battery adhesive is to provide additional testing and certification time for pCBtF-free materials. PAR 1168 would prohibit the use, supply, sale, offer for sale, distribution, packaging, repackaging, or possession of Regulated Products for use within the South Coast AQMD that contain dimethyl carbonate (DMC) in concentrations greater than 0.01 percent by weight or VMS in concentrations greater than 0.1 percent by weight.

The prohibition effective dates based on the product categories are illustrated in the following table included in the rule as below, the red box illustrates the categories with proposed changes.

Table 3-4: Prohibition Effective Dates

Category	Prohibition Effective Date	Sell-through End Date	Use-through End date
pCBtF Prohibition Effective Dates			
Roof Adhesive Primer	January 1, 2030	January 1, 2031	January 1, 2031
Battery Adhesive	January 1, 2029	January 1, 2030	January 1, 2031
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 Sealants (Except Cut Edge)			
All Other Roof Sealants			
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
	DMC and VMS Prohibition Effective Dates		
All Regulated Products	January 1, 2028	January 1, 2029	January 1, 2030

Exemptions [Subdivision (j)]

No facility has reported using the subparagraph (j)(5)(c) 55-gallon per year exemption, as required under paragraph (e)(6); therefore, staff is proposing to sunset this exemption as of January 1, 2028

Paragraph (j)(10) requires any manufacturer or private labeler utilizing this exemption to comply with the new reporting requirements specified in subparagraph (e)(7)(B).

CHAPTER 4 : IMPACT ASSESSMENT

EMISSIONS IMPACT

COSTS

SOCIOECONOMIC IMPACT ASSESSMENT

CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

COMPARATIVE ANALYSIS

Emission Impacts

The baseline VOC emissions for PAR 1168 are based on 2020 and 2021 QERs reported by the manufacturers on September 2022. The estimated baseline VOC emissions are approximately 9 tons per day and were determined by taking an average of the 8.6 and 9.4 tons per day VOC emissions reported for the 2020 and 2021 year in the QERs. The proposed amendments to Rule 1168 are not expected to result in additional VOC emissions; however, there will be delayed emission reductions. The amendments maintain existing VOC control limits but provide manufacturers additional time to complete reformulations. Introduction of alternative PW-MIR reactivity-based limits is intended to support compliance without increasing ozone-forming potential. Overall, no emission increases are anticipated at full implementation; however, there will be delayed emission reductions as a result of delaying compliance deadlines. In addition, minor emission reductions may occur as a result of removing the 55-gallon per year exemption by eliminating an outdated allowance for limited use of non-compliant products, though staff is not aware of any facility using this exemption.

Three categories, including top and trim adhesives; rubber vulcanization adhesives; and clear, paintable, and immediately water-resistant sealants, have delayed emission reductions due to extended compliance timelines. Table 4-1 shows the delayed emission reductions from these categories based on 2022 QER reports.

Table 4-1: Delayed Emission Reductions (tpd)

Category	Delayed Emission Reductions (tpd)	Date
Top and trim adhesive	0.115	1/1/2030
Rubber vulcanization adhesive	0.020	1/1/2029
Clear, paintable, immediately water-resistant sealant	0.011	1/1/2028
Total	0.146	

Costs

Staff does not anticipate significant cost impacts associated with the proposed amendments. The timeline extensions reduce near-term compliance costs by providing manufacturers additional time to develop and commercialize reformulated products. The optional PW-MIR compliance pathway may further reduce costs for categories facing technical reformulation barriers. Revisions to QER reporting requirements are largely administrative and are not expected to create substantial new burdens; manufacturers already track the necessary sales and distribution information. Sunsetting the 55-gallon exemption does not impose additional costs, because staff is not aware of any facility currently using the exemption and compliant products are available for all categories. As such, the proposed amendments are expected to have minimal economic impact.

Socioeconomic Impact Assessment

A socioeconomic impact assessment will be conducted and released for public review and comment at least 30 days prior to the South Coast AQMD Governing Board Hearing for PAR 1168, which is scheduled for December 4, 2026 (subject to change).

California Environmental Quality Act (CEQA)

Pursuant to CEQA and South Coast AQMD's certified regulatory program (Public Resources Code Section 21080.5, CEQA Guidelines Section 15251(l), and South Coast AQMD Rule 110), the South Coast AQMD, as lead agency for PAR 1168, has prepared a Draft Subsequent Environmental Assessment (SEA) for the proposed project. The Draft SEA is a substitute CEQA document prepared pursuant to CEQA Guidelines Section 15252 and in lieu of a Subsequent Environmental Impact Report. As allowed by CEQA Guidelines Sections 15152, 15162, and 15385, the Draft SEA tiers off of: 1) the Final Environmental Assessment for the October 2017 amendments to Rule 1168; and 2) the Final SEA for the November 2022 amendments to Rule 1168. The Draft SEA was released and circulated for a 46-day public review and comment period from September 18, 2026 to November 3, 2026 to provide public agencies and the public an opportunity to obtain, review, and comment on the environmental analysis. Comments made relative to the analysis in the Draft SEA and responses to the comments will be included in the Final SEA.

Draft Findings Under the Health and Safety Code

Health and Safety Code Section 40727 requires that prior to adopting, amending, or repealing a rule or regulation, the South Coast AQMD Governing Board shall make findings of necessity, authority, clarity, consistency, nonduplication, and reference, as defined in that section, based on relevant information presented at the hearing, this written analysis, and the rulemaking record. The draft findings are as follows:

Necessity – PAR 1168 is needed to allow additional time for roof sealant primer to be reformulated without pCBtF.

Authority – The South Coast AQMD Governing Board obtains its authority to adopt, amend, or repeal rules and regulations from Health and Safety Code Sections 39002, 40000, 40001, 40440, 40702 and 41508.

Clarity – Proposed Amended Rule 1168 – Adhesive and Sealant Applications, is written and displayed so that the meaning can be easily understood by persons directly affected by it.

Consistency – Proposed Amended Rule 1168 – Adhesive and Sealant Applications, is in harmony with, and not in conflict with or contradictory to, existing statutes, court decisions, or federal and state regulations.

Nonduplication – Proposed Amended Rule 1168 – Adhesive and Sealant Applications, does not impose the same requirement as any existing state or federal regulation, and the proposed amendments are necessary and proper to execute the powers and duties granted to, and imposed upon, the South Coast AQMD.

Reference – In amending this rule, the South Coast AQMD Governing Board references the following statutes which the South Coast AQMD hereby implements, interprets, or makes specific:

Health and Safety Code Sections 39002, 40000, 40001, 40406, 40702, 40440(a), 40725 through 40728.5, 40920.6, 41508 and federal Clean Air Act Sections 110, 172, and 182(e).

Comparative Analysis

Under Health and Safety Code Section 40727.2, the South Coast AQMD is required to perform a comparative analysis when adopting, amending, or repealing a rule or regulation. The comparative analysis is relative to existing federal requirements, existing or proposed South Coast AQMD rules and air pollution control requirements and guidelines which are applicable to VOC regulations for Adhesive and Sealant Applications. A comparative analysis will be prepared and released at least 30 days prior to the South Coast AQMD Governing Board Hearing on PAR 1168, which is anticipated to be heard on December 4, 2026 (subject to change).