



**NOTICE OF ADVISORY COMMITTEE MEETING  
PROPOSED AMENDMENTS TO RULE 74.20  
ADHESIVES AND SEALANTS**

The Ventura County Air Pollution Control District Advisory Committee will consider recommending proposed amendments to Rule 74.20. Staff is proposing to reduce reactive organic compound (ROC) emissions from the use of adhesives and sealants. This rule will implement an All Feasible Measures requirement of the California Clean Air Act (H&SC Section 40914). Ventura County APCD's 2016 Air Quality Management Plan relies on adopting All Feasible Measures to help attain the state ambient ozone air quality standard.

The meeting will be held at the following time and location:

**Tuesday – August 28, 2018  
7:30 p.m.  
First Floor Conference Room  
Ventura County Air Pollution Control District  
669 County Square Drive  
Ventura, CA**

This rule development is based on the VOC limits (adopted October 2017) on adhesives and sealants specified in Rule 1168 of the South Coast Air Quality Management District (SCAQMD), and staff held a public workshop on June 7, 2018. At this time, staff is not proposing to adopt those VOC limits indicated in Rule 1168 that require a future technology assessment (indicated by a footnote in Rule 1168). The proposed draft has been revised based on industry and EPA comments received to date and include the following:

1. New category (Aerosol Insulating Foam Sealant) with an ROC content limit of 250 g/l.
2. Exemption for two-component spray polyurethane foam systems that use exempt organic compounds as the blowing agent.
3. Exemption for one-component spray polyurethane foam systems from a cylinder containing not less than 10 pounds and not more than 23 pounds of prepolymerized mixtures and use exempt organic compounds as the blowing agent.
4. For the purpose of Rule 74.20, include the newest blowing agents (HFO-1234ze, HFO-1233zd, and HFO-1336mzz-Z) as exempt organic compounds in Section G, Definitions.
5. Clarified definition of Pressure Sensitive Adhesive Primer.

The public is invited to attend this meeting and provide input on this proposed new rule. The proposed rule and staff report may be downloaded from the APCD website ([www.vcapcd.org](http://www.vcapcd.org)). Contact Stan Cowen at (805) 645-1408 or email [stan@vcapcd.org](mailto:stan@vcapcd.org) if you have any questions or comments.

## SUMMARY OF SIGNIFICANT PROPOSED AMENDMENTS TO RULE 74.20

1. Section B.2, ROC or VOC Content Limits: The proposed ROC content limits are based on the October 2017 amendments to South Coast Air Quality Management District (SCAQMD) Rule 1168, except those future SCAQMD limits requiring a technology assessment are not being proposed. No changes are being proposed for the 250 grams per liter default ROC limit in Section B.1, or for any of the Substrate ROC limits in Subsection B.3. The new adhesive or sealant product categories with proposed ROC limits are shown in Table 1. This table compares the proposed ROC limits with the adopted SCAQMD VOC limits in Rule 1168.

**Table 1 – Summary of New Proposed Product Categories in Section B.2 (g/l)**

NEW PRODUCT CATEGORY	Proposed ROC Limit(g/l)	Rule 74.20 Effective Date	SCAQMD VOC Limit	SCAQMD Effective Date
Waterproof Resorcinol Glue	170	7-1-2019	170	1-1-2019
ABS to PVC Transition Cement	510	Upon Adoption	510	Current Limit
Pressure Sensitive Adhesive Primer	785	Upon Adoption	785	Current Limit
Aerosol Insulating Foam Sealant	250	Upon Adoption	250 50	Current Limit 1-1-2023
Non-Staining Plumbing Putty	150 50	7-1-2019 1-1-2023	150 50	Current Limit 1-1-2023
Potable Water Sealant	100	7-1-2019	100	Current Limit

Table 2 summarizes the proposed ROC content limits for existing adhesive or sealant categories. This table compares the proposed ROC limits for Rule 74.20 to those adopted in SCAQMD Rule 1168.

**Table 2 – Summary of New Proposed ROC Content Limits for Existing Categories in Section B.2(g/l)**

PRODUCT CATEGORY	CURRENT ROC LIMIT	PROPOSED ROC LIMIT	Rule 74.20 Effective Date	SCAQMD VOC Limit	SCAQMD Effective Date
Outdoor Carpet Adhesive	150	50	7-1-2019	50	1-1-2019
Wood Flooring Adhesive	100	20	1-1-2023	20	1-1-2023
Other Flooring Adhesive	150	50	7-1-2019	50	1-1-2019
ABS Welding Adhesive	400	325	7-1-2019	325	Current Limit
Plastic Welding Primer	650	550	7-1-2019	550	Current Limit
All Other Roof Sealants	420	300	7-1-2019	300 250	Current Limit 1-1-2023
All Other Architectural Sealants(Non-Roof)	250	50	7-1-2019	50	1-1-2019
All Other Sealants (Non-Architectural)	420	250	1-1-2023	250	1-1-2023

2. Section B.12, Compliance Statement Requirement: The proposed revisions will allow adhesive manufacturers to determine the maximum VOC content using product formulation data.
3. Section B.15, Sell-Through and Use-Through Provision: The new provision allows the sale and use of adhesives or sealants for a limited time (up to 3 years for sale and up to 4 years for use) that do not comply with future ROC content limits as long as the products have been manufactured prior to the effective date. The product label must show the manufacture date, or the date code must be provided to the District to qualify for this allowance.
4. Section G, Definition of Pressure Sensitive Adhesive Primer: Any adhesive primer intended by the manufacturer to be applied during the application of a pressure sensitive adhesive product.