



NOTICE OF PUBLIC WORKSHOP
PROPOSED AMENDMENTS TO RULE 74.20
ADHESIVES AND SEALANTS

The Ventura County Air Pollution Control District (VCAPCD) will hold a public workshop on proposed amendments to Rule 74.20. Staff is proposing to further reduce Reactive Organic Compound (ROC/VOC) emissions from the application of adhesives and sealants. Ventura County has been designated as a serious nonattainment area, and the proposed amendments will implement an All Feasible Measure as required by the California Clean Air Act (Health and Safety Code Section 40914) for nonattainment areas.

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

Thursday – June 7, 2018

10:00 a.m.

Santa Cruz Conference Room – 2nd Floor
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) (see attached proposal summary). 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). However, the proposed amendments do include new test methods (SCAQMD Test Methods 304 and 313) for determining VOC contents and SCAQMD Test Method 303 for determining exempt organic compound contents. In addition, coating manufacturers will be allowed to use formulation data to determine VOC content.

The public and industry are invited to attend this meeting and provide input on this rule development. The proposed rule amendments in strikeout/underline format and draft staff report may be downloaded from the APCD website (www.vcapcd.org). Please contact Stan Cowen at (805) 645-1408 or email stan@vcapcd.org if you have any questions or comments. If you would like to participate via conference call, the Dial-in Number is (513) 386-0000 and the Access Code is 497415#.

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
Non-Staining Plumbing Putty	150	7-1-2019	150	Current Limit
	50	1-1-2023	50	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	Current Limit
				250	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.