

Public Workshop
Proposed Amendments to 74.20
Adhesives and Sealants
June 7, 2018



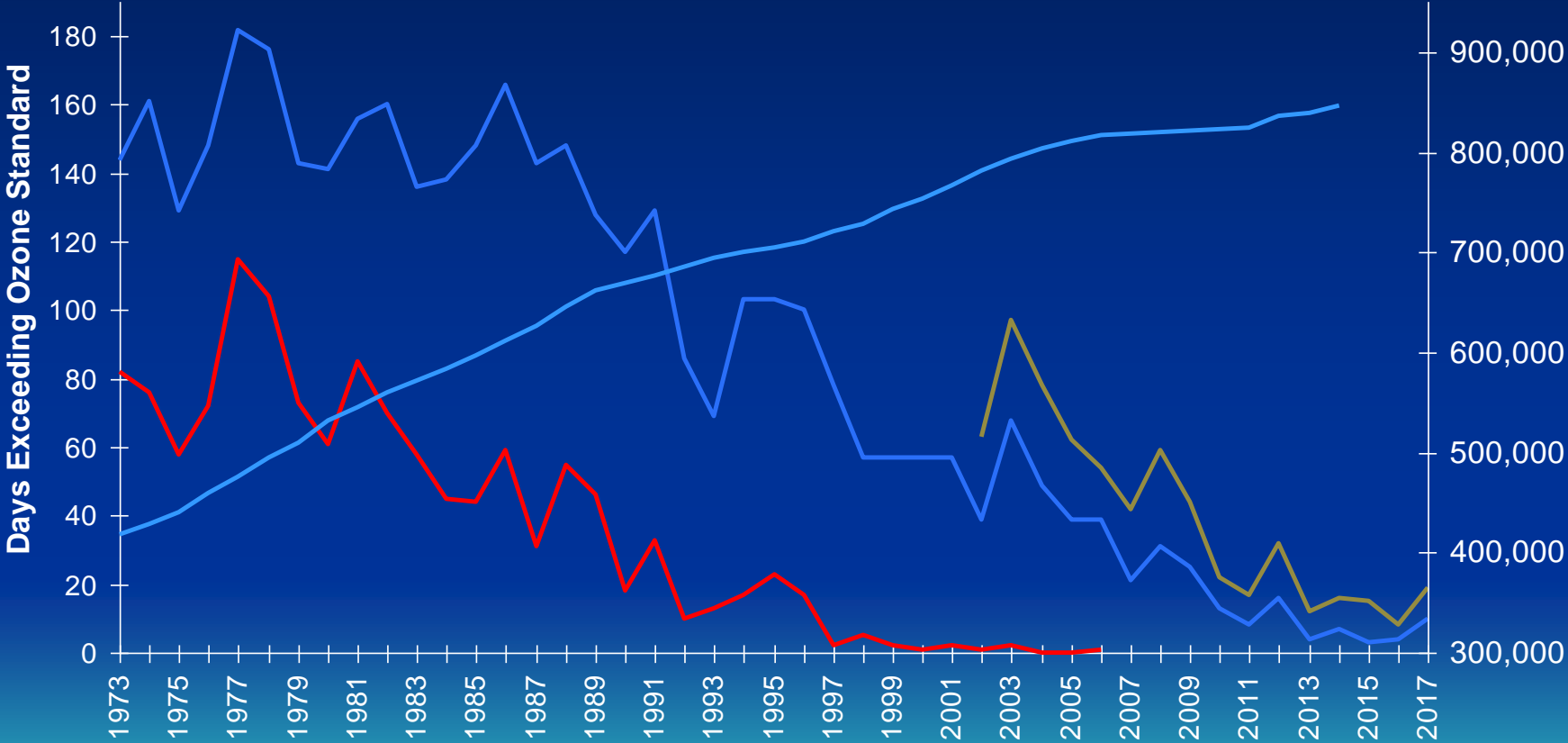
Ventura County
Air Pollution
Control District

Presentation Overview

- Air Quality (Ozone), California Clean Air Act
- Legislative Authority & Rule Background
- Adhesive Operations in Ventura County
- Proposed New Category VOC Limits
- Proposed Existing Category VOC Limits
- Other Proposed Amendments & Exemptions
- Emission reductions and costs
- Summary



Days Over Ambient Ozone Standards – Ventura County



Legislative Authority

- HSC Section 40914
 - All feasible measures.
- **This proposal identified as feasible measure based on:**
 - Implementation of South Coast AQMD Rule 1168.
 - Complying adhesives/sealants sold in Ventura County (shelf survey).
 - South Coast AQMD 2014 Survey of Adhesives/Sealants.



Rule Background

- **Reduces ROC emissions from solvents.**
- **Adopted in 1992, and 2003 was the last update for products ROC limits.**
- **Reasons for this proposal**
 - **Advances in adhesive technology**
 - **Need for ROC emission reductions to reach ozone standard**
 - **Based on work done by South Coast AQMD Rule 1168**
 - **New test methods developed by SCAQMD - Gas Chromatography**
- **Propose New VOC limits from SCAQMD Rule 1168 except those requiring a future technology assessment.**
- **Proposal should not impact the 11 permitted sources.**



Adhesive Operations in Ventura County

FACILITY NAME	PERMITTED EMISSIONS (TONS/YEAR)	TYPE OF OPERATION
California Amplifier	2.95	Communication Equipment
Drum Workshop	0.50	Musical Instruments
ERG International	0.84	Commercial Furniture
Freedom Designs	0.42	Medical Supplies
Ricoh Printing	0.42	Inkjet Print Heads
Milgard Manufacturing	0.94	Window Manufacturer
Parker Hannifin	0.36	Industrial Machinery
Pentair Pool Products	2.37	Swimming Pool Equipment
Robbins Auto Top	1.10	Vehicle Convertible Top Manufacture
Santa Maria Tire	0.18	Truck Tire Retreading
Waterway Plastic	0.68	Plastic Plumbing Fixtures
TOTAL ROC EMISSIONS	10.76	

VOC Limits for New Product Categories

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 50	7-1-2019 1-1-2023	150 50	Current Limit 1-1-2023
Potable Water Sealant	100	7-1-2019	100	Current Limit
Insulating Foam Sealant	250	Upon Adoption	250	Current Limit

Proposed ROC Limits (Existing Categories)

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 NonArchitectural)	420	250	1-1-2023	250	1-1-2023

Other Proposed Rule Amendments

- **Add new VOC Content test methods**
 - SCAQMD Method 313 – gas chromatography
 - Coating manufacturers may use formulation data to determine VOC.
- **Includes 3 year Sell-Through Period (4 years for use) for adhesives/sealants manufactured prior to the effective date to allow for inventory depletion.**
 - Does not apply to current VOC limits categories.
 - Manufacture dates or date codes required to determine eligibility.
- **No reporting requirements but recordkeeping required for stationary sources subject to Rule 74.20.**



Proposed Exemptions from ROC Limits

- **Field installation or repair of potable water linings and covers at water treatment, water storage, or water distribution facilities.**
- **Stand-alone elastomeric type products designed for immersion in liquids.**
- **Adhesive Tape.**
- **Two-Component Insulating Foams and Large-Cannister Insulating Foams (10 to 23 pounds cannisters) that use exempt organic compounds as both propellants and blowing agents.**



ROC Emission Reductions and Cost-Effectiveness

- **ROC emission reductions estimated at 15 tons per year.**
 - Almost all emission reduction from area sources.
- **Cost-effectiveness ranges from \$0.40 to \$3.70 per pound of ROC reduced for product reformulation (SCAQMD).**
- **No adhesive manufacturers in the county.**
- **Adhesives/Sealants reformulated to SCAQMD Rule 1168 VOC limits.**
 - Excluding future VOC limits requiring technology assessments.
- **Most complying adhesives already available and on shelves.**



Summary

- **Significant ROC reductions at 15 tons/year.**
- **Cost-effective measure (\$0.40 to \$3.70 per pound of ROC reduced).**
- **Required All Feasible Measure by state law for non-attainment areas.**
- **Excludes future VOC limits from SCAQMD Rule 1168 that will require technology assessment (no technology-forcing limits).**
- **No significant changes to existing stationary sources (adhesive operations).**

