PAR 1168: WORKING GROUP MEETING #3

JULY 19, 2017

CC2

WGM #2

Stakeholders raised concerns with:

- Aerosol Adhesive limited exemption
- Clarification between CARB CPR vs SCAQMD Rule 1168
- Frequency of Reporting
- VOC Limit Effective Dates
- Start date to prove compliance under prohibition of sale

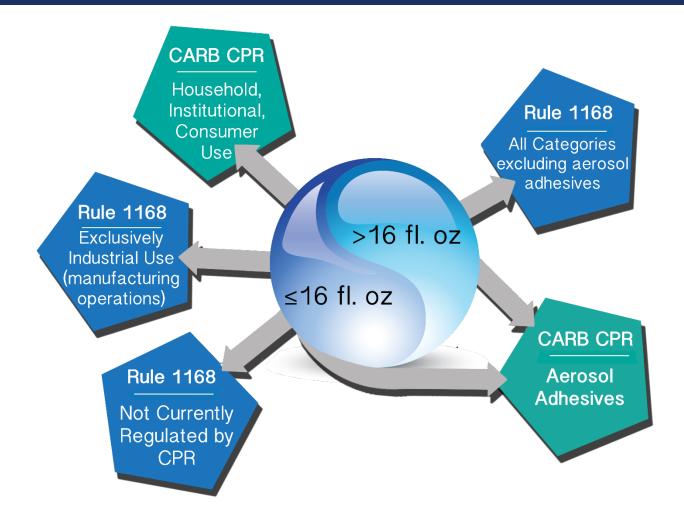


AEROSOL ADHESIVE AND ADHESIVE PRIMERS

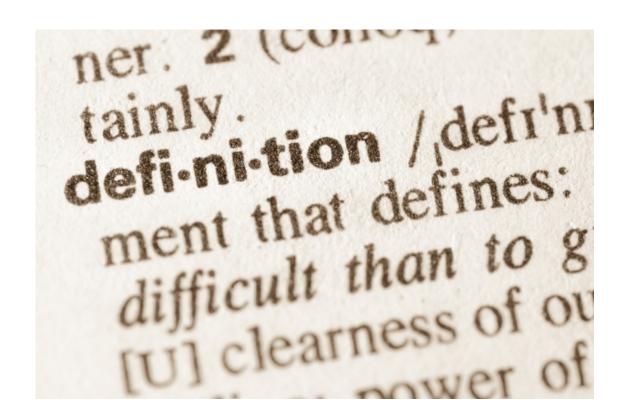


- Staff met with CARB staff who are currently surveying and evaluating current aerosol limits
- Now proposing to maintain current exemption
- Added specific reporting requirements in (f)(2)(C) for manufacturers
- Reporting can remain in weight percent

REGULATORY AUTHORITY



- Clear, Paintable and Immediately
 Water-Resistant Sealant
- Establishment
- Institutional use
- Modified Bituminous Primer
- Modified Bituminous Materials
- Non-Staining Plumbing Putty
- Ozone-Depleting Compound
- PVC
- Toxic Air Contaminant



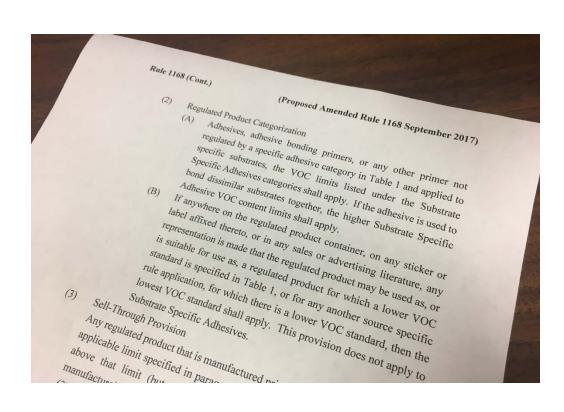
DEFINITIONS

VOC LIMITS

- Extended effective dates:
 - Waterproof Resorcinol Glue
 - Reinforced Plastic Composite
- Added categories or reductions:
 - Top and Trim Adhesive 250 g/L (SIP equivalency)
 - Other Plastic Cement Adhesives 100g/L
 - RACM/BACM commitment
 - All Other Sealants 250 g/L
 - ADDED Non-Staining Plumbing Putty 150 → 50 g/L
- Reinstalled VOC Categories:
 - Rubber Floor Adhesive
 - Modified Bituminous Sealant Primer
- Removed:
 - "Other Substrates" Substrate Specific Adhesives

	VOC Content Limit (g/L)				
Category	Current	Upon Rule Adoption	1/1/2019	1/1/2021	1/1/2023
Adhesives					
Architectural Applications					
Rubber Floor Adhesive	60				
Welding					
ABS to PVC Transition					
Cement	510				325*
CPVC	490				325*
PVC	510				325*
Other Plastic Cement					
Welding	250		100		
Top and Trim Adhesive	250	540			250
Waterproof Resorcinol Glue			170		
Substrate Specific Adhesive Applications					
Reinforced Plastic Composite	250		200		
Sealants and Caulks					
Architectural Applications					
Non-Staining Plumbing					
Putty	250	150			50
All Other Sealants	420			250	
Sealant Primers					
Modified Bituminous	500				

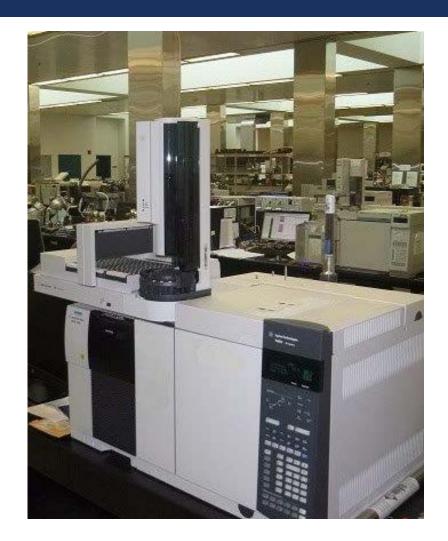
REGULATED PRODUCT CATEGORIZATION



- Separated language into two sections for clarity
 - Substrate Specific Adhesive Applications
 - Most restrictive clause

TEST METHODS

- Removed 316D method not fully developed, placeholder
- Modified language referencing Appendix
 A to Subpart PPPP of 40 CFR Part 63
- Multiple Test Methods clause
 - Modified to clarify "when more than one applicable test method or set of test methods are specified for any testing"



ADMINISTRATIVE REQUIREMENTS

Labeling

 Consolidated all labeling requirements under one section including Top and Trim, Rubber Vulcanization Adhesive, Pressure Sensitive Adhesive Primer, and ABS to PVC Transition Cement

Reporting

- Changed reporting frequency to every 3 years until 2025, every 5 years thereafter
- Aerosol adhesive and aerosol adhesive primer reporting required for products distributed into SCAQMD jurisdiction

Reporting Deadline	Reported Years		
September 1, 2019	2016, 2017, 2018		
September 1, 2022	2019, 2020, 2021		
September 1, 2025	2022, 2023, 2024		
September 1, 2030	2027, 2028, 2029		
September 1, 2035	2032, 2033, 2034		
September 1, 2040	2037, 2038, 2039		

ADMINISTRATIVE REQUIREMENTS



Aerosol reporting

- Product manufacturer
- Product name and code
- VOC content, in weight percent
- Total volume in gallons
- Container size of product

ADMINISTRATIVE REQUIREMENTS

- 55 gal/year exemption
 - For facilities that utilize this exemption
 - Reporting includes name and address of company product was purchased from



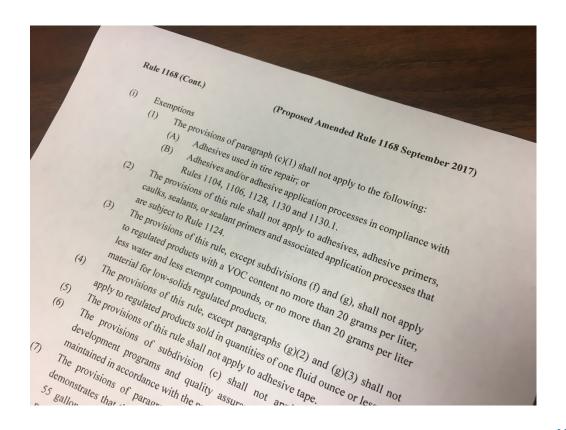
PROHIBITION OF USE



- Stakeholders requested starting date for proof of compliance for manufacturers or suppliers of noncompliant product
- Proposing start date of July 1, 2018 to provide adequate time to prepare and inform

EXEMPTION

- Reinstated Aerosol Exemption, except for reporting
- Clarified CPR Exemption



SCHEDULE



- August 2 WGM #3 Comments Due
- August 17 Public Workshop
- August 31 PW Comments Due
- Sept I Set Hearing
- Sept 15 Stationary Source Committee Meeting
- October 6 Final Public Hearing