Rule 1168 Guidance Document

WORKING GROUP MEETING #2 JULY 26, 2018

Background

2017 Rule Amendment

Included several new test methods

Governing Board Meeting

- Questioned how manufacturers could determine appropriate test method
- Directed staff to develop VOC Test Method Guidance Document

Prior to approval of Guidance Document

Formulation data will be used to verify compliance

Rule 1168 History

As adhesives and sealants evolve, new test methods must be developed

Rule 1168 was adopted April 7, 1989

- 14 amendments since adoption
- Originally applicable only to adhesives
- 19 adhesive categories

1998 Amendment

Added sealants

- 6 sealants categories
- 5 sealant primer categories

2017 Amendment

Latest amendment

- 37 adhesive categories
- 5 adhesive primer categories
- 12 sealants categories
- 5 sealant primer categories

History of 1168 VOC Test Methods

1989

1992

1998

2000

Rule referenced Laboratory Methods of Analysis for Enforcement Samples

 Gravimetric (bake and weigh) test method Additional Methods:

- Aerosols
- VOC exempt compounds
- Pipes cements

Additional Methods:

 VOC exempt compounds Additional Methods:

Cyanoacrylates

History of 1168 VOC Test Methods (cont.)

2017

Included 3 additional test methods

- Appendix A to Subpart PPPP of 40 CFR Part 63 -Determination of VOC Content of Reactive Adhesives
 - Included for reactive adhesives
 - Sandwich method where adhesive placed between two substrates

History of 1168 VOC Test Methods (cont.)

2017

Included 3 additional test methods

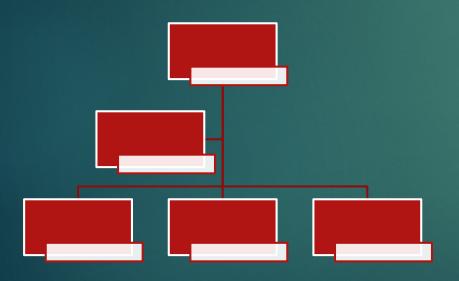
- SCAQMD Method 313 and ASTM D6886
 - For low-VOC, non-reactive adhesives and sealants
 - Directly measure VOC content by Gas Chromatography-Mass Spectrometry
 - SCAQMD Method 313 utilized for compliance purposes
 - Guidance document will include clarification on the differences between methods

Method Development

Beyond 2017

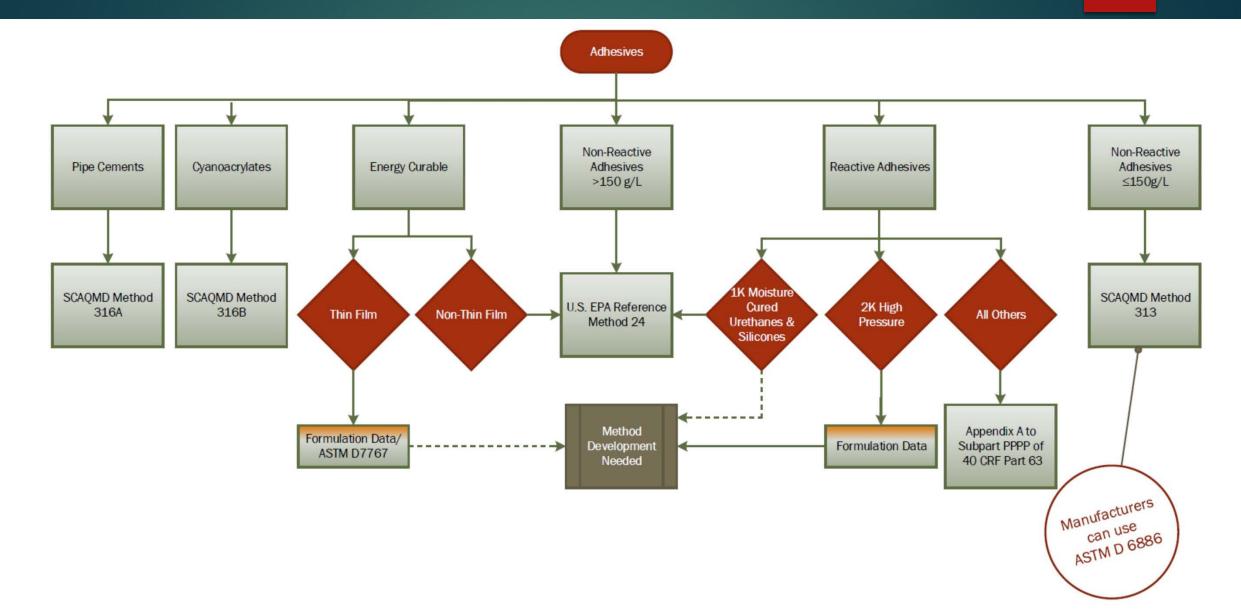
- Ongoing Method Development
 - Foam Sealants
 - High pressure reactive adhesives
- Potential Future Method Development
 - One-component moisture cure urethanes
 - Thin-film energy curable

Flow Charts

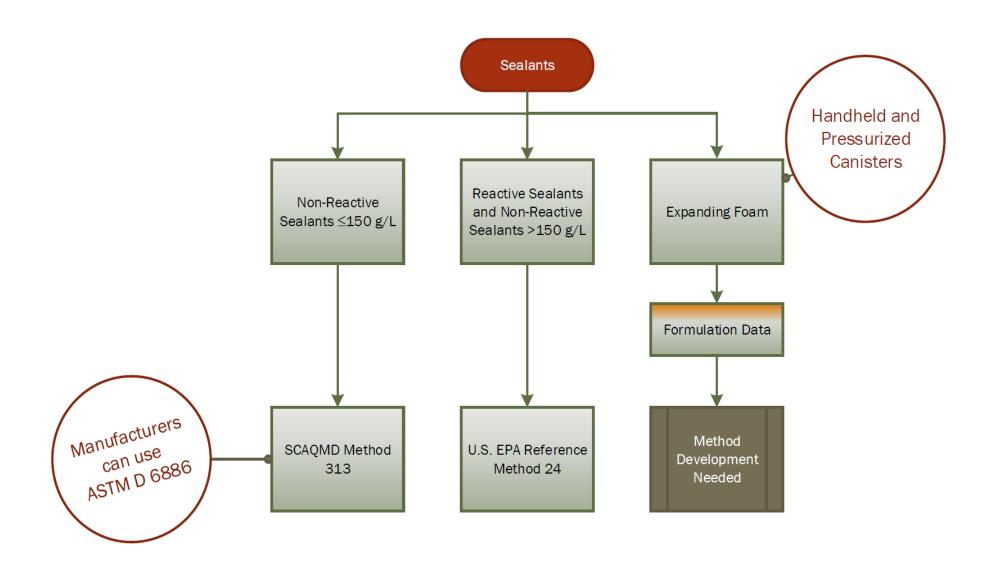


- The key mechanism of the Guidance Document
- Direct stakeholder to appropriate test method
- Separate charts for adhesives and sealants

Adhesives

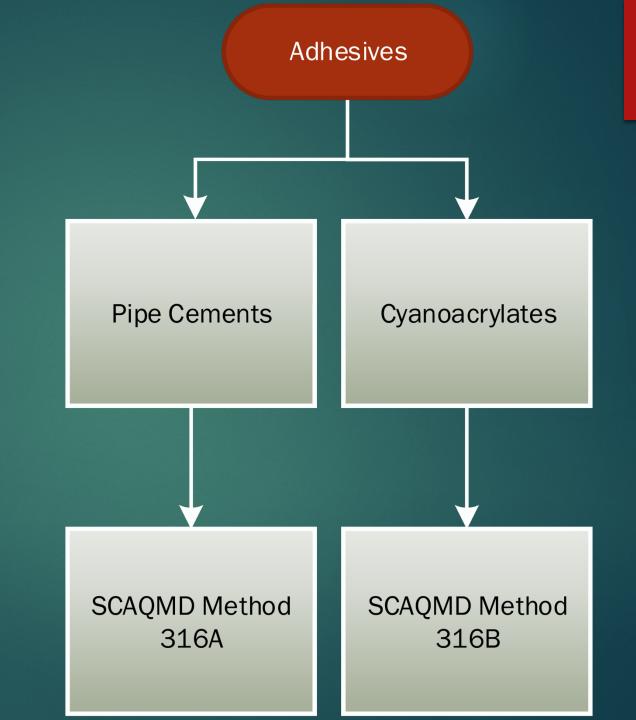


Sealants

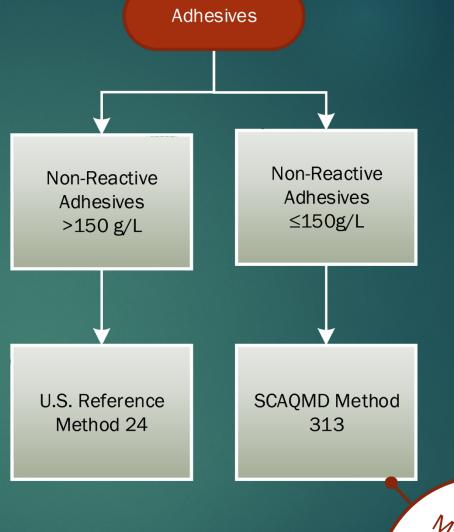


Adhesives
with
Specific
Test
Methods

Staff does not anticipate further method development



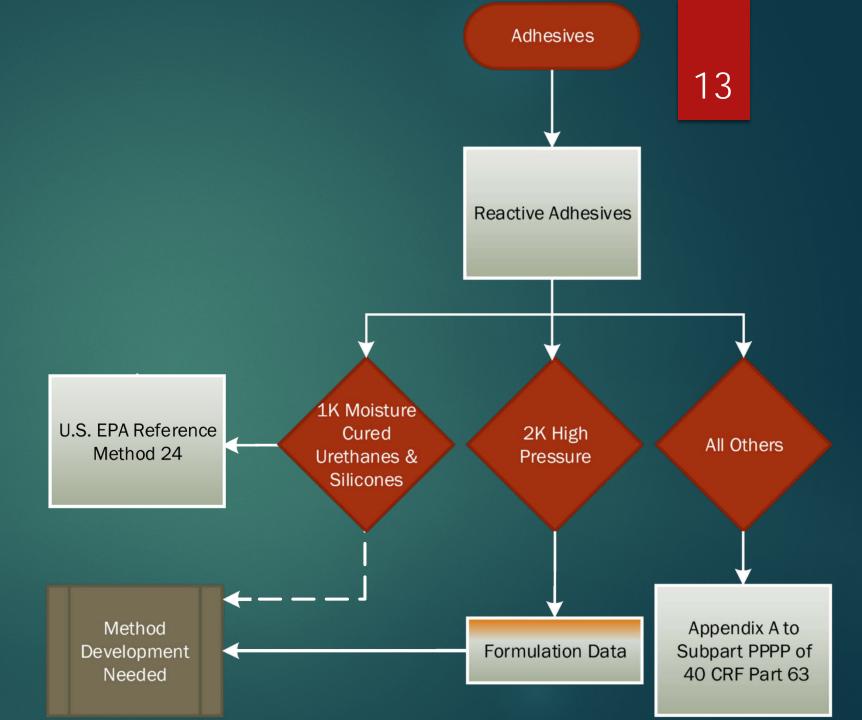
Non-Reactive Adhesives



Manufacturers
ASTMD 6886

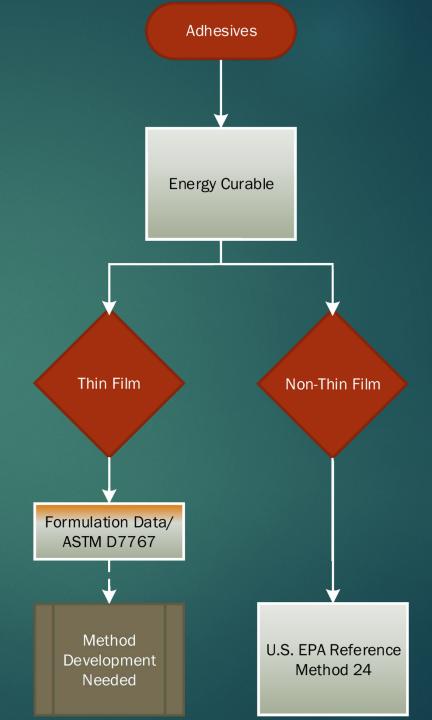
Reactive Adhesives

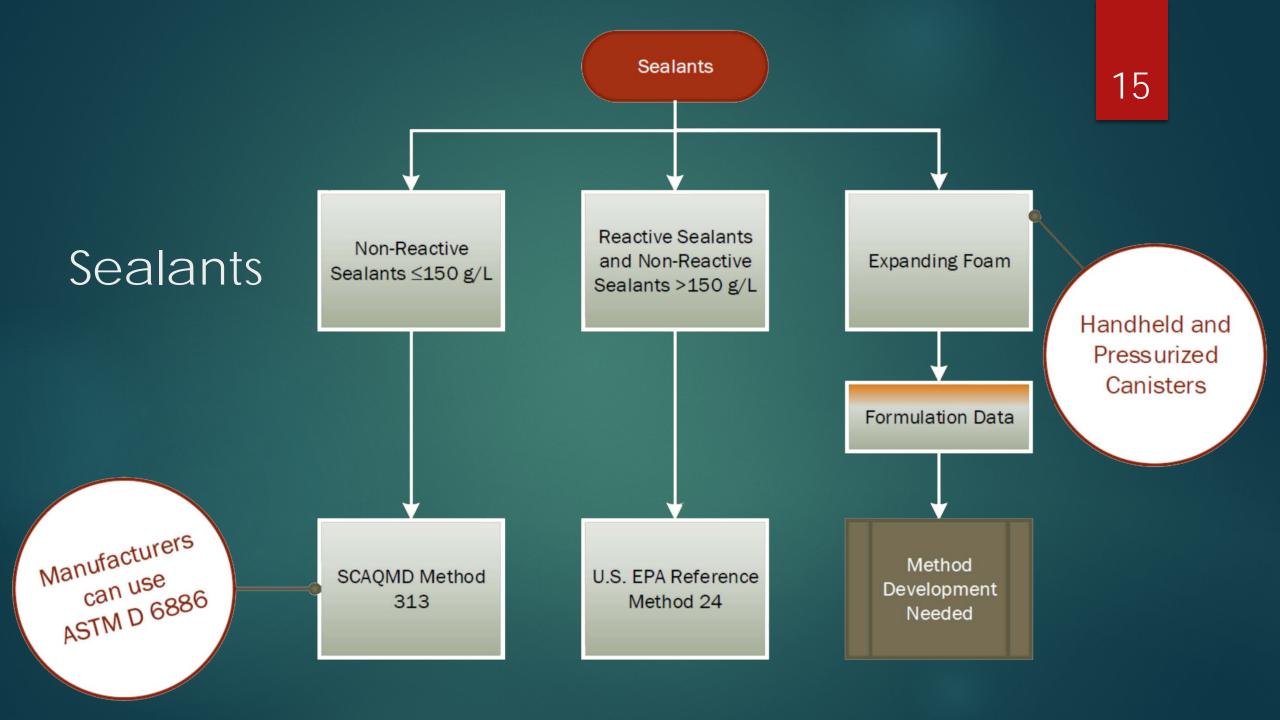
Some method development required



UV/EB/LED Technology

Possible future method development





Next Steps

- Draft Guidance Document released July 18th
 - Comments due August 9, 2018
 - Stationary Source Committee September 21, 2018
 - Board Presentation October 5, 2018
 - Continue Method Development

Contacts

Heather Farr 909-396-3672

hfarr@aqmd.gov

Program Supervisor Planning, Rules and Area Sources Brad Parrack 909-396-3071

bparrack@aqmd.gov

Principal AQ Chemist Laboratory Services

David De Boer 909-396-2329

ddeboer@aqmd.gov

Area Sources Manager Planning, Rules and Area Sources