



Air Pollution Control Board
Greg Cox District 1
Dianne Jacob District 2
Pam Slater District 3
Ron Roberts District 4
Bill Horn District 5

Air Pollution Control District
R. J. Sommerville Director

COMPLIANCE ADVISORY

Notice of Adoption of Rule 67.21 Adhesive Material Application Operations

On December 16, 1998, the Air Pollution Control District adopted new Rule 67.21 that regulates volatile organic (VOC) emissions from adhesive material application operations. When emitted, VOC's contribute to the formation of ozone in the lower atmosphere. San Diego County does not meet state and national air quality standards for ozone. Rule 67.21 meets the state mandate to implement all feasible control measures and apply Best Available Retrofit Control Technology (BARCT) to reduce VOC emissions.

Rule 67.21 requirements become effective June 16, 1999.

New Rule 67.21 includes the following:

Applicability

Rule 67.21 applies to both architectural and industrial adhesive application operations, which includes all steps involved in the application, drying and/or curing of adhesive materials, surface preparation, stripping and cleanup. Portions of Rule 67.21 also apply to any person who supplies, sells, offers for sale or specifies the application of adhesive materials.

Exemptions

The following are exempt from all Rule 67.21 requirements:

- Self-curing adhesive materials containing reactive diluents.
- Adhesive materials containing less than 20 grams of VOC per liter of adhesive material, as applied, less water and less exempt compounds.
- Low-solids adhesive materials containing less than 20 grams of VOC per liter of adhesive material, as applied.
- Adhesive materials, including aerosol adhesives, which are sold in packages containing 16 fluid ounces or less, or one pound or less, except for plastic welding product adhesives.
- Any adhesive material application operation subject to the requirements of District Rules 67.4, 67.5, 67.9, or 67.16.
- Tire repair provided the label on the adhesive being used states "For Tire Repair Only."
- Assembly and manufacture of undersea-based weapon systems.
- Testing or evaluating adhesive materials in any quality assurance or analytical laboratory.
- Plastic welding products used to manufacture medical devices.

Small Operation Exemption

Small operations using less than a total of 55 gallons of adhesive materials in a calendar year at a stationary source are exempt from the Rule 67.21 VOC content limits except for the "General Adhesive Material" VOC content limits specified in Subsection (d)(1)(i). Monthly purchase records and monthly or daily usage records must be kept to qualify for this exemption.

Non-Compliant Material Exemption	<p>Rule 67.21 allows the use of up to a total 55 gallons per calendar year of non-complying adhesive materials, adhesive bonding agents and surface preparation, stripping and cleaning materials. Records as specified in Rule 67.21 Section (f) must be kept to qualify for this exemption.</p> <p>This exemption does not apply to the "General Adhesive Materials" listed in Subsection (d)(1)(i).</p>
Definitions	<p>The rule provides definitions for terms used in Rule 67.21.</p>
VOC Limits	<p>The rule establishes VOC content limits for a large variety of adhesive materials. Adhesive materials are separated into four categories: general adhesive materials, specialty adhesive materials, substrate-specific adhesive materials, and all other adhesive materials. Each category includes sub-categories of adhesive materials based on application purposes, types of material being bonded, or other common characteristics.</p> <p>A VOC content limit is specified for each sub-category. The rule also limits the VOC content for aerosol adhesives to 75% by weight, including the propellant.</p>
Surface Preparation, Stripping, Cleanup Operations and Adhesive Bonding Agents	<p>The rule requires the use of materials (solvents) with low VOC content, high boiling point or low vapor pressure for surface preparation, stripping and cleanup operations and for adhesive bonding agents.</p> <p>The rule also lists various approved methods for adhesive application equipment cleanup operations.</p>
Prohibition of Specification and Sale	<p>The rule prohibits any person from specifying the application of adhesive materials not complying with the VOC content limits, and prohibits the sale of "General Adhesive Materials" (architectural and plastic welding adhesives) exceeding the allowable VOC content limits. These prohibitions apply only to products sold for use in San Diego County.</p>
Control Equipment	<p>Add-on air pollution control equipment with at least 85% overall VOC emission reduction efficiency may be used as an alternative means of complying. If a facility proposes to install air pollution control equipment, an application for Authority to Construct and Permit to Operate must be submitted to the District by June 16, 1999, and the equipment must be fully operational and in compliance by June 16, 2000.</p>
Recordkeeping Requirements	<p>Rule 67.21 requires facilities to keep monthly or daily material usage records for all adhesive application operations, except for use of "General Adhesive Materials" (architectural and plastic welding adhesives).</p> <p>Records must include a current list of each VOC containing material, the applicable sub-category, manufacturer identification, mix ratio of components, and the VOC content, vapor pressure and/or initial boiling point, as applicable.</p> <p>Monthly inventory (dispensing) records must be maintained for each solvent used as an adhesive bonding agent or for stripping, surface preparation, or cleaning material.</p> <p>All records required by Rule 67.21 must be retained on site for at least three years and made available upon request.</p>
Test Methods	<p>Test methods for determining compliance are specified in the rule.</p>

A copy of Rule 67.21 is available by contacting the District at (619) 694-3307 or visiting the District's web site at www.sdapcd.co.san-diego.ca.us. For more information, please call the District's Compliance Division at (619) 694-3340.



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SECOND NOTICE OF DECEMBER 16, 2001, COMPLIANCE REQUIREMENTS FOR ADHESIVE MATERIALS SUBJECT TO

Rule 67.21 Adhesive Material Application Operations

On December 16, 1998, the Air Pollution Control District (District) adopted new Rule 67.21 regulating volatile organic compound (VOC) emissions from adhesive material application operations. In February 1999, a Compliance Advisory was sent to affected sources and interested parties advising them of the rule requirements. This second advisory is being provided to remind affected sources that use contact adhesives that after December 16, 2001, the VOC content limits for General and Special contact adhesives will be lowered to 250 and 400 grams per liter (g/l), respectively. The current limit for both adhesive categories is 540 g/l.

Adhesive material operations currently using contact adhesives should review these materials to ensure compliance with the new lower VOC limits. If your current contact adhesive material does not comply with the above limits, contact your supplier for compliant alternatives. While these lower limits are currently in effect in other parts of the state, it may take several months to find an alternative adhesive material that is acceptable for your application. Accordingly, alternative compliant adhesive materials should be investigated as soon as possible. Compliant contact adhesive materials that meet the 250 or 400 g/l content limit will primarily be waterbased adhesive materials. These materials may require some process changes (e.g., additional drying time) or additional training for employees.

After December 16, 2001, all General and Special contact adhesives used must have a maximum VOC content of 250 and 400 g/l, respectively. A General contact adhesive is an adhesive specified by the manufacturer to form an instantaneous bond that cannot be repositioned once the substrates, on which the adhesive has been applied and allowed to dry, are brought together using momentary pressure. A Special contact adhesive is a contact adhesive specified by the manufacturer to be used for the bonding of non-porous substrates to each other; the bonding of decorative laminate in postforming applications;

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the bonding of decorative laminate to metal, melamine-covered board, or curved surfaces; or when used to bond any substrate to metal, rubber, flexible vinyl, rigid plastic, or wood veneer.

Attached is a copy of the first Rule 67.21 Compliance Advisory that contains more detailed information on rule requirements and exemptions.

A copy of Rule 67.21 can be obtained by visiting the District's web site at: www.sdapcd.co.san-diego.ca.us under Rules and Regulations, or by calling (858) 650-4700 and asking for a copy to be mailed to you.

For additional information, please contact the District's Compliance Division at (858) 650-4550.

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