



COUNTY OF SAN DIEGO

AIR POLLUTION CONTROL DISTRICT

AIR POLLUTION CONTROL BOARD

GREG COX
First District

DIANNE JACOB
Second District

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Third District

RON ROBERTS
Fourth District

BILL HORN
Fifth District

DATE: May 14, 2008

TO: San Diego County Air Pollution Control Board

SUBJECT: AMENDMENTS OF RULE 67.21 – ADHESIVE MATERIAL APPLICATION OPERATIONS (District: All)

SUMMARY:

Overview

Proposed amendments to Rule 67.21 will reduce volatile organic compound content limits for some architectural and specialty adhesive materials, and will also provide clarifications and updates. If implemented, amended Rule 67.21 is expected to reduce volatile organic compound emissions from adhesive material application operations by approximately 390 tons per year (31%) with no additional costs for affected businesses. The proposed amendments to Rule 67.21 are necessary to comply with State law, which requires adoption of all feasible control measures to reduce emissions of ozone precursors.

The Air Pollution Control Board is requested to adopt proposed amendments to Rule 67.21 – Adhesive Material Application Operations. Rule 67.21 regulates emissions of volatile organic compounds from the application of adhesives, sealants, and adhesive and sealant primers. Volatile organic compounds contribute to ozone (smog) formation and can be toxic.

Recommendation(s)

AIR POLLUTION CONTROL OFFICER

1. Find that it is certain there is no possibility that amending Rule 67.21 may have a significant adverse effect on the environment, and that this action is exempt from the provisions of California Environmental Quality Act (CEQA) pursuant to California Code of Regulations, Title 14, Section 15061(b)(3).
2. Adopt a resolution titled Resolution Amending Rule 67.21 of Regulation IV of the Rules and Regulations of the San Diego County Air Pollution Control District.

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Fiscal Impact

The recommended amendments to Rule 67.21 will not have a significant fiscal impact on the Air Pollution Control District. The amended rule will be enforced with existing District staff, and full-cost recovery is anticipated through the San Diego County Air Pollution Control District's Permit Program.

Business Impact Statement

All types of adhesive materials complying with the proposed new limits on volatile organic compound content are readily available from manufacturers, distributors, and local retail stores. Their cost is equal or less than adhesives with a higher volatile organic compound content thus, amending Rule 67.21 will not adversely impact the business community.

Advisory Board Statement

There was no quorum at the March 12, 2008 meeting of the District Advisory Committee. Members present recommended adopting the proposed amendments to Rule 67.21.

BACKGROUND:

Rule 67.21 was first adopted in 1998. Since then, the adhesive and sealant manufacturing industry has focused on further reducing volatile organic compound (VOC) content in adhesive materials. Consequently, lower-emitting adhesive materials are now readily available in the marketplace. Associated amendments to Rule 67.21 are necessary to fulfill the State requirement to adopt all feasible control measures to reduce air pollution. San Diego County does not yet meet State and federal air quality standards for ozone. This action is a feasible control measure that will contribute toward meeting requirements.

The proposed amendments will reduce VOC content limits for flooring adhesives, multipurpose construction adhesives, contact adhesives, and some adhesives applied on porous materials such as wood. The amendments will also clarify that facilities may annually use less than 55 gallons of non-compliant adhesive materials, but that this low-use exemption does not apply to the associated clean-up, stripping, surface preparation solvents, or adhesive bonding agents. In addition, the amendments will exempt aerosol adhesives that are currently regulated under the California Air Resources Board Consumer Products regulation. The amendments also include several new definitions and updated test methods.

On November 5, 2007, the San Diego County Air Pollution Control District held a public workshop to discuss and receive comments on the proposed amended rule. No significant issues were raised.

Compliance with Board Policy on Adopting New Rules

On February 2, 1993 (APCB #2), the Board directed that, with the exception of a regulation requested by business or a regulation for which a socioeconomic impact assessment is not required, no new or revised regulation shall be implemented unless specifically required by

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federal or State law. Proposed amendments to Rule 67.21 are required by State law, which calls for adoption of every feasible control measure to accelerate progress toward achieving ambient air quality standards for ozone. Therefore, implementation of the proposed amendments is consistent with the Board's directive.

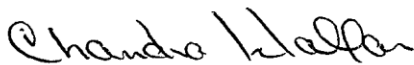
Environmental Statement

It can be seen with certainty that there is no possibility that amending Rule 67.21 may have a significant adverse impact on the environment. This action is exempt from the California Environmental Quality Act (CEQA) pursuant to California Code of Regulations, Title 14, Section 15061(b)(3).

Linkage to the County of San Diego's Strategic Plan

The County's five-year strategic plan includes an Environment Initiative to ensure environmental preservation and enhance quality of life. Amended Rule 67.21 will provide a significant reduction of VOC emissions. The amendments will not negatively affect the local business community because all types of adhesive materials complying with the proposed new limits are readily available in the marketplace. The amended rule appropriately balances air quality preservation, public health protection, and economic development needs.

Respectfully submitted,



CHANDRA L. WALLAR
Deputy Chief Administrative Officer



ROBERT KARD
Air Pollution Control Officer

ATTACHMENTS

- Attachment A – Resolution Amending Rule 67.21 of Regulation IV of the Rules and Regulations of the San Diego County Air Pollution Control District
- Attachment B – Change Copy – Rule 67.21
- Attachment C – Socioeconomic Impact Assessment
- Attachment D – Comparative Analysis
- Attachment E – Incremental Cost-Effectiveness Analysis
- Attachment F – Workshop Report

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AGENDA ITEM INFORMATION SHEET

CONCURRENCE(S)

COUNTY COUNSEL REVIEW	<input checked="" type="checkbox"/> Yes	
Written disclosure per County Charter §1000.1 required?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
GROUP/AGENCY FINANCE DIRECTOR	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> N/A
CHIEF FINANCIAL OFFICER	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> N/A
Requires Four Votes	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
GROUP/AGENCY INFORMATION TECHNOLOGY DIRECTOR	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> N/A
COUNTY TECHNOLOGY OFFICE	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> N/A
DEPARTMENT OF HUMAN RESOURCES	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> N/A

Other Concurrence(s): N/A

ORIGINATING DEPARTMENT: Air Pollution Control District, County of San Diego

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AGENDA ITEM INFORMATION SHEET
(continued)

PREVIOUS RELEVANT BOARD ACTIONS:

December 16, 1998 (APCB #1), Adoption of New Rule 67.21 – Adhesive Material Application Operations; February 2, 1993 (APCB #2), Delayed implementation of new or revised regulations unless requested by business, specifically ordered by federal or State law, or for which a socioeconomic impact assessment is not required.

BOARD POLICIES APPLICABLE:

N/A

BOARD POLICY STATEMENTS:

N/A

CONTRACT AND/OR REQUISITION NUMBER(S):

N/A

(4) Any adhesive material application operation subject to the requirements of Rules 67.4, 67.5, 67.9, or 67.16 shall not be subject to this rule.

(5) The provisions of Subsection (d)(2) of this rule shall not apply to surface preparation, stripping, or cleaning operations conducted in equipment subject to Rule 67.6.1 or Rule 67.6.2.

(6) Any adhesive material used in the manufacture of aircraft float systems shall be subject to this rule, and not subject to Rule 67.9.

(b) EXEMPTIONS

(1) Adhesive Materials

The provisions of Sections (d)(1), (e), and (f) shall not apply to the following:

(i) Adhesive materials sold, supplied, and used in single or multi-unit packages having an aggregate net weight of one pound or less or containing an aggregate of 16 fluid ounces or less. This exemption does not apply to plastic welding products specified in Subsection (d)(1)(i)(B).

(ii) Self-curing adhesive materials containing reactive diluents.

(iii) Adhesive materials that contain less than 20 grams of VOC per liter of adhesive material, as applied, less water and less exempt compounds.

(iv) Low-solids adhesive materials that contain less than 20 grams of VOC per liter of adhesive material, as applied.

(v) Aerosol adhesive materials.

It is the responsibility of any person claiming an exemption pursuant to Subsections (b)(1)(ii) through (b)(1)(iv) to maintain current manufacturers' specifications which substantiate this claim. These records shall be kept on site for at least three years and be made available to the District upon request.

(2) Specified Adhesive Material Application Operations

The provisions of this rule shall not apply to the following adhesive material application operations:

(i) Tire repair operations, provided a label on the adhesive being used states "For Tire Repair Only."

(ii) Assembly and manufacture of undersea-based weapon systems.

(iii) Testing or evaluating of adhesive materials in any quality assurance or analytical laboratory.

(iv) Plastic welding products used to manufacture medical devices.

(3) Small Usage of Adhesive Materials at Stationary Sources

The provisions of this rule, except for the requirements of Subsection (d)(1)(i), shall not apply to any stationary source which uses less than 55 gallons per calendar year of all adhesive materials specified in Subsections (d)(1)(ii) through (d)(1)(iv). Any person claiming this exemption shall maintain monthly purchase and monthly or daily usage records of adhesive materials. These records shall be maintained on site for at least three years and be made available to the District upon request.

(4) Non-Compliant Adhesive Material Usage at Stationary Sources

The provisions of Subsections (d)(1)(ii) through (d)(1)(iv), and (d)(2) shall not apply to adhesive materials, surface preparation, stripping, and cleanup materials, and adhesive bonding agents used in volumes less than 55 gallons per calendar year provided that a total of less than 55 gallons in the same calendar year of all such non-compliant materials are used at the stationary source. Any person claiming this exemption shall maintain records according to the applicable requirements of Section (f).

(c) **DEFINITIONS**

For the purposes of this rule, the following definitions shall apply:

(1) **"ABS (Acrylonitrile-Butadiene-Styrene) Welding Adhesive"** means an adhesive material specified by the manufacturer to weld ABS plastic pipe.

(2) **"Adhesive"** means a substance that is used to bond one surface to another surface by attachment.

(3) **"Adhesive Bonding Agent"** means a solvent applied to a substrate after the application of an adhesive, to enhance bonding.

(4) **"Adhesive Material"** means an adhesive, sealant, adhesive primer, or sealant primer.

(5) **"Adhesive Primer"** means any product specified by the manufacturer to be applied to a substrate, prior to the application of an adhesive, to enhance the bonding surface.

(6) **"Aerosol Adhesive"** means an adhesive packaged as an aerosol product in which the spray mechanism is permanently housed in a non-refillable can designed for hand-held application without the need for ancillary hoses or spray equipment.

(7) "**Aircraft Float System**" means any utility float, emergency float, evacuation slide, or airborne life raft manufactured for use onboard aircraft.

(8) "**Architectural Sealant**" means a sealant specified by the manufacturer to be applied to stationary structures, including mobile homes, and their appurtenances. Appurtenances to an architectural structure include, but are not limited to: hand railings, cabinets, bathroom and kitchen fixtures, fences, rain gutters and downspouts, and windows.

(9) "**Architectural Sealant Primer**" means a sealant primer specified by the manufacturer to be applied to stationary structures, including mobile homes, and their appurtenances, prior to the application of a sealant, to enhance the bonding surface. Appurtenances to an architectural structure include, but are not limited to: hand railings, cabinets, bathroom and kitchen fixtures, fences, rain gutters and downspouts, and windows.

(10) "**Automotive Glass Adhesive Primer**" means an adhesive primer specified by the manufacturer to be applied to automotive glass to improve adhesion to the pinch weld and block ultraviolet light, prior to application of an adhesive.

(11) "**Carpet Pad Adhesive**" means an adhesive specified by the manufacturer to be used for the installation of a carpet pad (or cushion) beneath a carpet.

(12) "**Ceramic Tile Installation Adhesive**" is an adhesive specified by the manufacturer to be used for the installation of ceramic tiles.

(13) "**Computer Diskette Jacket Manufacturing Adhesive**" means an adhesive specified by the manufacturer to glue the fold-over flaps to the body of a vinyl computer diskette jacket.

(14) "**Contact Adhesive - General**" means 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.

(15) "**Contact Adhesive - Special**" means 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 application, or for 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. An adhesive which also meets the definition of either Elastomeric Adhesive or Top & Trim Adhesive shall not be considered a contact adhesive.

(16) "**Cove Base Installation Adhesive**" is an adhesive specified by the manufacturer for the installation of cove base (or wall base), which is generally made of vinyl or rubber, on a wall or vertical surface at floor level.

(17) **"CPVC (Chlorinated Polyvinyl Chloride) Welding Adhesive"** means an adhesive specified by the manufacturer for the welding of CPVC plastic pipe.

(18) **"Elastomeric Adhesive"** means a rubber or thermoplastic based adhesive specified by the manufacturer to be used in the manufacture of life preserving equipment including, but not limited to, aircraft float systems, life rafts, and life jackets; or other personal or equipment protection products.

(19) **"Exempt Compound"** means the same as defined in Rule 2.

(20) **"Low-Solids Adhesive Material"** means any adhesive material that contains 120 grams or less of solids per liter of material.

(21) **"Marine Deck Sealant/Primer"** means a sealant or sealant primer specified by the manufacturer to be applied to wooden marine decks.

(22) **"Medical Device"** means an instrument, apparatus, implement, machine, contrivance, implant, in vitro reagent or other similar article including any component or accessory, that is intended for use in the diagnosis of disease or other conditions or in the cure, mitigation, treatment, or prevention of disease, or is intended to affect the structure or any function of the body.

(23) **"Metal To Elastomer Molding Or Casting Adhesive"** means an adhesive specified by the manufacturer to bond metal to rubber or urethane elastomers through a heated molding or casting process in order to fabricate products such as rollers and wheels.

(24) **"Multipurpose Construction Installation/Repair Adhesive"** means an adhesive specified by the manufacturer for the installation or repair of various construction materials, including, but not limited to, drywall, panel, ceiling tile, and acoustical tile.

(25) **"Multi-Unit Package"** means a single package which includes two or more separately contained components of a multi-component adhesive material.

(26) **"Natural Gas Pipeline Tape Adhesive Primer"** means an adhesive primer specified by the manufacturer to be applied to underground natural gas pipelines prior to the application of a natural gas pipeline protective tape.

(27) **"Non-membrane Roof Installation/Repair Adhesive/Sealant"** means an adhesive or sealant specified by the manufacturer for the installation or repair of non-membrane roofs and which is not specified for the installation of prefabricated single-ply flexible roofing membrane. This definition includes plastic or asphalt roof cement and cold application cement.

(28) **"Perimeter Bonding Adhesive"** means an adhesive specified by the manufacturer to be used for application to the perimeter of vinyl backed sheet flooring installed onto non-porous substrates such as flexible vinyl.

(29) **"Plastic Cement Welding Adhesive"** means an adhesive made of resins and solvents that is formulated to dissolve the surfaces of plastic to form a bond between mating surfaces.

(30) **"Plastic Cement Welding Adhesive Primer"** means an adhesive primer specified by the manufacturer to prepare plastic substrates prior to the application of an adhesive for bonding or welding.

(31) **"Porous Material"** means a substance that has small, often microscopic, pores in which fluids may be absorbed or discharged. Such materials include, but are not limited to, particle board, paper, and corrugated paperboard.

(32) **"PVC (Polyvinyl Chloride) Welding Adhesive"** means an adhesive specified by the manufacturer for the welding of PVC plastic pipe.

(33) **"Reactive Diluent"** means a liquid reactant that is part of an uncured adhesive material and that reacts during the curing process to become part of the solid adhesive material.

(34) **"Roadway Sealant"** means a sealant specified by the manufacturer to be applied to public streets, highways and other surfaces, including, but not limited to, curbs, berms, driveways, and parking lots.

(35) **"Rubber"** means a natural or manmade elastomer, including, but not limited to, styrene-butadiene rubber (SBR), polychloroprene (neoprene), butyl rubber, nitrile rubber, chlorosulfonated polyethylene (CSM), and ethylene-propylene diene terpolymer (EPDM).

(36) **"Rubber Flooring Adhesive"** means an adhesive specified by the manufacturer to be used for the installation of flooring material in which both the back and the top surfaces are made of synthetic rubber, and which may be in sheet or tile form.

(37) **"Sealant"** means a material that is formulated primarily to fill, seal, waterproof, or weatherproof gaps or joints between two surfaces. Sealants include caulk materials. Sealants do not include sealers.

(38) **"Sealant Primer"** means any product specified by the manufacturer to be applied to a substrate, prior to the application of a sealant, to enhance the bonding surface.

(39) **"Sealer"** means a coating formulated for and applied to substrates to prevent subsequent coatings from being absorbed by the substrate or to prevent harm to subsequent coatings by materials in the substrate.

(40) **"Self-Curing Adhesive Material with Reactive Diluents"** means a cyanoacrylate or silicone-based adhesive material with a reactive diluent content of at least 95% by weight.

(41) **"Sheet Rubber Lining Installation Adhesive"** means an adhesive specified by the manufacturer to be used for sheet rubber lining applied to the interior of tanks used for storage or transportation of corrosive liquids.

(42) **"Single-Ply Roof Membrane"** means single-thickness sheets of rubber, usually EPDM (ethylene-propylene diene terpolymer), that are applied in a single layer to a building roof.

(43) **"Single-Ply Roof Membrane Installation/Repair Adhesive/Primer"** means an adhesive or adhesive primer specified by the manufacturer to be used for the installation or repair of single-ply roof membrane.

(44) **"Single-Ply Roof Membrane Sealant"** means a sealant specified by the manufacturer to be applied to single-ply roof membrane.

(45) **"Structural Glazing Adhesive"** means an adhesive specified by the manufacturer to attach glass, ceramic, metal, stone or composite panels to exterior building frames.

(46) **"Structural Wood Member Adhesive"** means an adhesive specified by the manufacturer to be used for the construction of any load bearing joints in wooden joists, trusses, or beams.

(47) **"Subfloor Adhesive"** means an adhesive specified by the manufacturer to be used for the installation of subflooring material over floor joists.

(48) **"Thin Metal Laminating Adhesive"** means an adhesive specified by the manufacturer to bond multiple layers of metal to metal, or metal to plastic, in the production of electronic or magnetic components in which the thickness of the bond line(s) is less than 0.25 mils.

(49) **"Tire Retread Adhesive"** means an adhesive specified by the manufacturer to be applied to the back of pre-cured tread rubber and to the casing and cushion rubber in the assembly of retread tires. It may also be used to seal buffed tire casings to prevent oxidation while the tire is being prepared for a new tread.

(50) **"Top and Trim Adhesive"** means an adhesive specified by the manufacturer to be used for installing automotive or marine trim, including, but not limited to headliners, vinyl tops, vinyl trim, sunroofs, dash covering, door covering, floor covering, panel covering and upholstery.

(51) **"Traffic Marking Tape"** means a pre-formed reflective film specified by the manufacturer to be applied to public streets, highways, and other surfaces including, but not limited to, curbs, berms, driveways, and parking lots.

(52) **"Traffic Marking Tape Adhesive Primer"** means any adhesive primer specified by the manufacturer to be applied to surfaces prior to the installation of traffic marking tape.

(53) **"VCT and Asphalt Tile Adhesive"** means an adhesive specified by the manufacturer to be used for the installation of vinyl composite tile (VCT) or asphalt tile flooring. Vinyl composite tile is a material made from thermoplastic resins, fillers, and pigments.

(54) **"Volatile Organic Compound (VOC)"** means the same as in Rule 2.

(55) **"VOC Content Per Volume of Adhesive Material, Less Water and Exempt Compounds"** means the weight of VOC per combined volume of VOC and adhesive material solids and is calculated by the following equation:

$$C_{Cvoc} = (W_s - W_w - W_{es}) / (V_m - V_w - V_{es})$$

where:

C_{Cvoc}	=	VOC content per volume of adhesive material, less water and exempt compounds
W_s	=	weight of volatile compounds including water and exempt compounds
W_w	=	weight of water
W_{es}	=	weight of exempt compounds
V_m	=	volume of adhesive material including water and exempt compounds
V_w	=	volume of water
V_{es}	=	volume of exempt compounds

(56) **"VOC Content Per Volume of Material"** means the weight of VOC per volume of material and is calculated by the following equation:

$$C_{Mvoc} = (W_s - W_w - W_{es}) / (V_m)$$

where:

C_{Mvoc}	=	VOC content per volume of material
W_s	=	weight of volatile compounds including water and exempt compounds
W_w	=	weight of water
W_{es}	=	weight of exempt compounds
V_m	=	volume of material including water and exempt compounds

(57) **"Waterproof Resorcinol Glue"** means a two-part, resorcinol-resin-based adhesive specified by the manufacturer for applications where the bond line must be resistant to continuous immersion in fresh or salt water.

(58) **"Wood Flooring Adhesive"** means an adhesive specified by the manufacturer to be used for the installation of wood flooring, which may include but is not limited to parquet tiles, wood planks, or strip-wood.

(d) **STANDARDS**

The VOC content of low-solids adhesive materials shall be calculated per volume of adhesive material, as applied. The VOC content of all other adhesive materials shall be calculated per volume of adhesive material, as applied, less water and exempt compounds.

(1) A person shall not apply any adhesive material specified below with a VOC content in excess of the following limits:

(i) GENERAL ADHESIVE MATERIALS

(A) Architectural Products	<u>VOC LIMITS</u> <u>(grams/liter)</u>
Architectural sealant	250
Architectural sealant primer for:	
-Non-porous materials	250
-Porous materials	775
Ceramic tile installation adhesive	65
Cove base installation adhesive	50
Flooring adhesives:	
Indoor carpet or carpet pad adhesive	50
Rubber flooring adhesive	60
Subfloor adhesive	50
VCT and asphalt tile adhesive	50
Wood flooring adhesive	100
Other floor covering adhesive	150
Multipurpose construction installation/repair adhesive	70
Non-membrane roof installation/repair adhesive/sealant	300
Perimeter bonding adhesive	660
Roadway sealant	250
Single-ply roof membrane installation/repair adhesive/primer	250
Single-ply roof membrane sealant	450
Structural glazing adhesive	100
Structural wood member adhesive	140
Traffic marking tape adhesive primer	150
 (B) Plastic Welding Products	
ABS welding adhesive	400
CPVC welding adhesive	490
PVC welding adhesive	510
Plastic cement welding adhesive primer	650
Other plastic cement welding adhesives	510

(ii)	<u>SPECIALTY ADHESIVE MATERIALS</u>	<u>VOC LIMITS</u> <u>(grams/liter)</u>
	Automotive glass adhesive primer	700
	Computer diskette jacket manufacturing adhesive	850
	Contact adhesive	
	-General	80
	-Special	250
	Elastomeric adhesive	750
	Marine deck sealant/primer	760
	Metal to elastomer molding or casting adhesive	850
	Natural gas pipeline tape adhesive primer	600
	Sheet rubber lining installation adhesive	850
	Thin metal laminating adhesive	780
	Tire retread adhesive	100
	Top and Trim adhesive	540
	Waterproof resorcinol glue	170

If more than one VOC limit provided in Subsections (d)(1)(i) or (d)(1)(ii) is applicable, the most stringent VOC limit shall apply.

(iii) SUBSTRATE-SPECIFIC ADHESIVES

If an adhesive is not listed in Subsection (d)(1)(i) or (d)(1)(ii), the following VOC limits are applicable on a substrate-specific basis.

Adhesives applied onto:	<u>VOC LIMITS</u> <u>(grams/liter)</u>
Fiberglass	80
Metal	30
Porous material (except wood)	50
Wood	30
Other substrates	250

If an adhesive is used to bond together two or more substrates listed in (d)(1)(iii), the highest applicable substrate-specific VOC limit shall apply.

(iv) ALL OTHER ADHESIVE MATERIALS

If an adhesive material or specific substrate is not listed in Subsections (d)(1)(i) through (d)(1)(iii) above, the following VOC limits are applicable.

	<u>VOC LIMITS</u> <u>(grams/liter)</u>
Adhesive primers	250
Sealants	420
Sealant primers	750

(2) Surface Preparation, Stripping, and Cleanup Materials, and Adhesive Bonding Agents

A person shall not use VOC containing materials for surface preparation, stripping, cleanup or as an adhesive bonding agent unless:

- (i) The material contains 70 grams or less of VOC per liter of material; or
- (ii) The material has an initial boiling point of 190°C (374°F) or greater; or
- (iii) The material has a total VOC vapor pressure of 45 mm Hg or less, at 20°C (68°F).

(3) Cleaning of Application Equipment

A person shall not use VOC containing materials for the cleaning of application equipment used in operations subject to this rule unless:

- (i) The material contains 70 grams or less of VOC per liter of material; or
- (ii) The material has an initial boiling point of 190°C (374°F) or greater; or
- (iii) The material has a total VOC vapor pressure of 45 mm Hg or less, at 20°C (68°F); or
- (iv) The cleaning material is flushed or rinsed through the application equipment in a contained manner that will minimize evaporation into the atmosphere; or
- (v) The application equipment or equipment parts are cleaned in a container, which is open only when being accessed for adding, cleaning, or removing application equipment or when cleaning material is being added, provided the cleaned equipment or equipment parts are drained to the container until dripping ceases; or
- (vi) A system is used that totally encloses the component parts being cleaned during the washing, rinsing, and draining processes; or
- (vii) Other application equipment cleaning methods are used that are demonstrated to be as effective as any of the equipment described above in minimizing the VOC emissions to the atmosphere, provided that the method has been tested and approved in writing by the Air Pollution Control Officer prior to use.

(4) Prohibition of Specification

A person shall not specify the application of an adhesive material subject to this rule for any operation in San Diego County if such application results in a violation of any

provision of this rule. This prohibition is applicable to any written or oral contract under the terms of which any adhesive material is applied to any component within San Diego County.

(5) Prohibition of Sale

A person shall not supply, sell, or offer for sale any adhesive material listed under Subsection (d)(1)(i) which, at the time of sale, exceeds the VOC limits listed. This provision only applies to products that are supplied to or sold to persons for application within San Diego County.

(e) **CONTROL EQUIPMENT**

(1) In lieu of complying with the provisions of Subsections (d)(1), (d)(2), or (d)(3) of this rule, a person may use an air pollution control system which:

(i) Has been installed in accordance with an Authority to Construct; and

(ii) Includes an emission collection system, which captures organic gaseous emissions, including emissions associated with applicable adhesive material application, equipment cleaning, and surface preparation operations, and transports the captured emissions to an air pollution control device; and

(iii) Has a combined emissions capture and control device efficiency of at least 85 percent by weight.

(2) A person electing to use control equipment pursuant to Section (e)(1) shall submit to the Air Pollution Control Officer for approval an Operation and Maintenance plan for the proposed emission control device and emission collection system and receive approval prior to operation of the control equipment. Thereafter, the plan can be modified with Air Pollution Control Officer approval as necessary to ensure compliance. Such plan shall:

(i) Identify all key system operating parameters. Key system operating parameters are those necessary to ensure compliance with Subsection (e)(1)(iii) such as temperature, pressure, and/or flow rate; and

(ii) Include proposed inspection schedules, anticipated ongoing maintenance, and proposed recordkeeping practices regarding the key system operating parameters.

(3) Upon approval of the Air Pollution Control Officer, a person subject to the requirements of Section (e) shall implement the Operation and Maintenance plan and shall comply with the provisions of the approved plan thereafter.

(f) RECORDKEEPING

All records required by this rule shall be retained on site for at least three years and shall be made available to the District upon request.

(1) Any person subject to the provisions of Subsections (d)(1)(ii) through (d)(1)(iv), (d)(2), or (d)(3) of this rule shall maintain the following records:

(i) Maintain a current list of each adhesive material, adhesive bonding agent, stripping, surface preparation, and cleaning material used, which provides all of the data necessary to evaluate compliance, including but not limited to:

(A) the category of adhesive material as specified in Subsection (d)(1);

(B) manufacturer name and identification for each adhesive material or its components, adhesive bonding agent, stripping, surface preparation, and cleaning material;

(C) mix ratio of components; and

(D) VOC content, vapor pressure and/or initial boiling point, as applicable, for each adhesive material, adhesive bonding agent, stripping, surface preparation, and cleaning material; and

(ii) Maintain daily or monthly records of the amount of each adhesive material used; and

(iii) Maintain monthly inventory (dispensing) records for each solvent used as an adhesive bonding agent, or for stripping, surface preparation, or cleaning.

(2) Any person using control equipment pursuant to Section (e) of this rule shall:

(i) Maintain records in accordance with Subsection (f)(1); and

(ii) Maintain daily records of key system operating parameters as approved in the Operation and Maintenance plan. Such records shall be sufficient to document continuous compliance with Subsection (e)(1)(iii) during periods of emission producing activities.

(g) TEST METHODS

(1) Measurement of the VOC content of all non-aerosol adhesive materials, adhesive bonding agent, surface preparation, stripping, and cleaning materials subject to Subsections (d)(1), (d)(2) and/or (d)(3) of this rule shall be conducted in accordance with Environmental Protection Agency (EPA) Test Method 24 (40 CFR Part 60, Appendix A).

(2) Measurement of the VOC content of any plastic welding cement adhesive material subject to Subsection (d)(1)(i)(B) shall be determined using South Coast Air Quality Management District's Method 316A, as it exists on (date of adoption).

(3) Calculation of total VOC vapor pressure for materials subject to Subsections (d)(2)(iii) and/or (d)(3)(iii) of this rule shall be conducted in accordance with the District's "Procedures for Estimating the Vapor Pressure of VOC Mixtures." If the vapor pressure of the liquid mixture, as calculated by this procedure, exceeds the limits specified in Subsections (d)(2)(iii) and/or (d)(3)(iii), the vapor pressure shall be determined in accordance with ASTM Standard Test Method D2879-97(2007), or its most current version. The solvent composition shall be determined using ASTM Standard Practice E260-96(2006), or its most current version. The fraction of water and exempt compounds in the liquid phase shall be determined by using ASTM Standard Test Methods D3792-05 and D4457-02, or their most current versions, and shall be used to calculate the partial pressure of water and exempt compounds. The results of vapor pressure measurements obtained using ASTM Test Method D2879-97(2007), or its most current version, shall be corrected for partial pressure of water and exempt compounds.

(4) Measurement of the initial boiling point for materials subject to Subsection (d)(2)(ii) and/or (d)(3)(ii) of this rule shall be conducted in accordance with ASTM Standard Test Method D1078-05, or its most current version.

(5) Measurement of the emission collection system capture efficiency subject to Subsection (e)(1)(iii) of this rule shall be determined according to EPA's Test Method 204 and technical document, "Guidelines for Determining Capture Efficiency," dated January 9, 1995, using a protocol approved by the Air Pollution Control Officer. Subsequent to the initial compliance demonstration period, applicable key system operating parameters, as approved by the Air Pollution Control Officer, may be used as verification that capture efficiency has not diminished.

(6) Measurement of control device efficiency subject to Subsection (e)(1)(iii) of this rule shall be conducted with EPA Methods 18 and/or 25A (40 CFR 60) and in accordance with a protocol approved by the Air Pollution Control Officer.

(7) Measurement of solvent losses from alternative application cleaning equipment subject to Subsection (d)(3)(vii) shall be conducted and reported in accordance with the South Coast Air Quality Management District's "General Test Method for Determining Solvent Losses from Spray Gun Cleaning Systems," as it exists on (date of adoption).

(8) Measurement of the solids content of adhesive materials pursuant to Subsection (c)(20) shall be conducted in accordance with EPA Test Method 24 (40 CFR 60, Appendix A).

(9) Measurement of the VOC content of adhesive materials pursuant to Subsection (c)(40) shall be conducted in accordance with South Coast Air Quality Management District's Method 316B, as it exists on (date of adoption).

IT IS FURTHER RESOLVED AND ORDERED that the subject amendments to Rule 67.21 of Regulation IV shall take effect six months from date of adoption.

APPROVED AS TO FORM AND LEGALITY
COUNTY COUNSEL

BY H. Dutton
SENIOR DEPUTY

PASSED AND ADOPTED by the Members of the Air Pollution Control Board of the San Diego County Air Pollution Control District, State of California, this 14th day of May, 2008, by the following vote:

AYES: Cox, Jacob, Slater-Price, Roberts, Horn

I hereby certify that the foregoing is a full, true and correct copy of the Original Resolution entered in the Minutes of the Air Pollution Control Board.

THOMAS J. PASTUSZKA
Clerk of the Air Pollution Control Board

By: Catherine Santos
Catherine Santos, Deputy



Resolution No. 08-090
5/14/08 (AP1)