

United States Environmental Protection Agency, Region IX

Air Division

Technical Support Document

for

EPA's Direct Final Rulemaking

for the

f e c e e g c e g e e c

California State Implementation Plan

South Coast Air Quality Management District

Rule 1168, Adhesive and Sealant Applications

Yvonne Fong

November 2003

Agency Name: South Coast Air Quality Management District (SCAQMD)

Submitted Rule: Rule 1168, Adhesive and Sealant Applications

Adopted: October 3, 2003

Submitted: November 14, 2003

Complete: November 19, 2003

Previous Rule The SCAQMD adopted amendments to Rule 1168 on June 7 and July 12,

Submittals: 2002 and submitted the rules to EPA as revisions to the State Implementation Plan (SIP).

Approved Rule: Rule 1168, Adhesive and Sealant Applications

Adopted: September 15, 2000

Submitted: March 14, 2001

Approved: April 26, 2002 (67 FR 20645)

Rule Summary

Rule 1168 limits emissions of volatile organic compounds (VOC), resulting from the application of adhesives, adhesive primers, sealants, and sealant primers. Rule 1168 was previously approved into the SIP as detailed above. The approved rule contained one deficiency. This submitted rule was intended to correct that prior deficiency.

Major Revisions to Rule 1168

Submitted Rule 1168 makes the following changes to the applicable SIP rule (unless otherwise noted, section references are to the submitted version of the rule).

- The purpose has been revised to include the elimination of emissions from chloroform, ethylene dichloride, methylene chloride, perchloroethylene, and trichloroethylene (Section a).
- Seven definitions have been added (Section b).
- The effective date of limits for PVC and CPVC welding, other plastic cement welding, and adhesive primers for plastics have been postponed for two years (Section c2).
- The limit for top and trim adhesives has been temporarily relaxed for one year (Section c2).
- The provision requiring SCAQMD to conduct technology assessments for the limits cited as revision number 3 above has been deleted since their completion (SIP-approved Section d).

- New reporting requirements have been included in Section d.
- A prohibition of sale after January 1, 2004 on adhesives, sealants, or adhesive or sealant primers containing chloroform, ethylene dichloride, methylene chloride, perchloroethylene, or trichloroethylene has been added in Section i2. This prohibition is limited by new conditions in Sections i3C-D.
- Sunset dates for small user exemptions in Sections k4 and k10 have been removed.
- The exemption for light curable adhesives in Section k11 has been revised to require sources to maintain records pursuant to Section e and to limit VOC content to 50 g/L.
- An exemption for products used in the fabrication orthotics and prosthetics has been added in Section k16.
- An exemption for shoe repair, luggage, and handbag adhesives has been added in Section k17.

Rule Evaluation

This rule was evaluated against the State of California Air Resources Board's *Determination of Reasonably Available Control Technology and Best Available Retrofit Control Technology for Adhesives and Sealants* (Determination) dated December 1998.

The Determination was developed in concert with many local air pollution control districts (APCDs) in the state. Representatives of local APCDs reviewed adopted district rules regulating the adhesives and sealants category. Therefore, the standards in the Determination are a reflection of the technology currently available and the standards already in effect in many parts of the state.

EPA's *Issues Relating to VOC Regulation Cutpoints, Deficiencies, and Deviations* (May 25, 1988)(the "Bluebook") and EPA Region IX's *Guidance Document for Correcting Common VOC & Other Rule Deficiencies* (August 21, 2001)(the "Little Bluebook") were also used to evaluate this rule. Rule 1168 is generally consistent with these documents and EPA SIP approval criteria.

Appendix D/RACT Deficiencies

As described in our April 26, 2002 (67 FR 20645), the approved version of this rule contained one rule provision that conflicted with Section 110 and Part D of the Clean Air Act. The approved version exempted light curable products. This provision has been revised and no longer prevents full approval of the submitted rule.

No new enforceability deficiencies or relaxations from the applicable SIP were identified in this submitted rule that are significant enough to affect SIP approvability.

Suggestions for Rule Improvement

There are no suggestions for rule improvement at this time.

Net Effect on Emissions

The SCAQMD estimates that these amendments to Rule 1168 will postpone 0.21 tons per day of VOC reductions for an additional year due to the delayed implementation of the 250 g/L limit for top and trim adhesives.

Recommended Action

Rule 1168 is consistent with the relevant requirements regarding RACT, the Clean Air Act (Sections 110 and Part D), the "Blue Book", and other EPA policies. Therefore, Rule 1168 is recommended for approval under Section 110(k) as meeting the requirements of Clean Air Act Section 110.

Attachments

1. Rule 1168, Adhesive and Sealant Applications (adopted October 3, 2003).
2. Rule 1168, Adhesive and Sealant Applications (adopted September 15, 2000).
3. State of California Air Resources Board. *Determination of Reasonably Available Control Technology and Best Available Retrofit Control Technology for Adhesives and Sealants*. December 1998 (cover only).
4. U.S. EPA. *Issues Relating to VOC Regulation Cutpoints, Deficiencies, and Deviations*. May 25, 1988 (the "Bluebook," cover only).

5. U.S. EPA Region IX. *Guidance Document for Correcting Common VOC & Other Rule Deficiencies*. August 21, 2001 (the "Little Bluebook," cover only).