

COMPLIANCE ASSISTANCE BULLETIN
December 2011

Rule 4653 – ADHESIVES AND SEALANTS – Changes to Allowable VOC Limits

On September 16, 2010, the San Joaquin Valley Air Pollution Control District amended Rule 4653 – *Adhesives and Sealants*. The purpose of this rule is to limit emissions of Volatile Organic Compounds (VOC) from the application of adhesive products, sealant products, and associated solvent cleaning operations. This Bulletin is a basic summary of changes and additional requirements of the rule that will take effect on January 1, 2012.

Adhesive Products

- The allowable VOC content of many categories of adhesive products will be reduced significantly. Except for the limits found immediately below for adhesives, the categories and their new limits are too numerous to be inserted into this document. The new limits can be found in Table 2 and Table 3 in the text of the rule.
- Drywall, subfloor, and panel adhesives are now considered separate adhesive categories each with a VOC content limit of 50 grams per liter.

Sealants and Sealant Primers

VOC Content Limits for Sealants	
Sealant	VOC Limit Effective on and after January 1, 2012 (Grams Per Liter)
Architectural	250
Marine Deck	760
Non-membrane Roof	300
Roadway	250
Single-Ply Roof Membrane	450
Other Sealants	420

VOC Content Limits for Sealant Primers	
Sealant Primer	VOC Limit Effective on and after January 1, 2012 (Grams Per Liter)
Architectural Non Porous	250
Architectural Porous	775
Modified Bituminous	500
Marine Deck	760
Other Sealant Primers	750

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Work Practices for Adhesive Products and Sealant Products

Such practices include, but are not limited to:

- Storing adhesives, sealants, and waste solvent materials in closed, non-absorbent containers.
- Keeping mixing containers closed at all times except when depositing or removing materials.
- Minimizing spills of VOC-containing adhesive products.
- Conveying VOC-containing product from one location to another in closed containers or pipes.

Organic solvents for cleaning

VOC Limits for Organic Solvents Used in Cleaning Operations	
Type of Solvent Cleaning Operation	VOC Content Limit Grams of VOC/liter of material (lb/gal)
A. Product Cleaning During Manufacturing Process or Surface Preparation for Adhesive Application	
1. General	25 (0.21)
2. Surface Preparation Prior to Rubber Vulcanization Process	850 (7.1)
B. Repair and Maintenance Cleaning	25 (0.21)
C. Cleaning of Adhesive Application Equipment	25 (0.21)

Administrative Requirements

- Rule 4653 contains a prohibition of sale. There is also a sell-through provision; non-compliant product may be sold for up to 12-months, provided it is labeled with a manufacture date prior to January 1, 2012. Product with a label specifying the manufacture date and compliance with previous limit may be applied for up to 24 months after the effective date.
- Rule 4653 contains a prohibition of specification. Specifying or requiring the use of non-compliant adhesives and sealants constitutes a violation of the rule.
- Operators will be required to keep record of sealant materials used and stored.
- Manufacturers of sealants must label their product according to the requirements established in Section 6.2 (Labeling Requirements).

Rule 4653 may affect your operation in ways not mentioned in this Bulletin. You may find additional exemptions, requirements, and information by reading the full text of the rule at: <http://www.valleyair.org/rules/currentrules/r4653.pdf> or by calling the District's SBA staff at the numbers listed below:

Modesto: 209-557-6446 Fresno: 559-230-5888 Bakersfield: 661-392-5665