



June 2004

FACT SHEET For ADHESIVES

This fact sheet has been written in order to advise facilities that use adhesives of rule changes that may affect their operation. On April 8, 2004, the Placer County Board of Directors amended Rule 235, Adhesives. The effective date for the new provisions is April 8, 2005 - 12 months from the date the amended Rule was adopted.

Rule 235, Adhesives, regulates the volatile organic content of adhesive and sealant products and of solvents used for surface preparation and cleanup. The amendments to this rule broadened its applicability to include adhesives that had not previously been regulated. This rule affects those who supply, sell, offer for sale, or use an adhesive or sealant product or a surface preparation and cleanup solvent. The rule also applies to anyone who solicits, requires the use of, or specifies the application of an adhesive or sealant product that does not comply with the rule.

The amendments establish a limit of 200 grams per liter of Volatile Organic Compounds (VOCs) for contact adhesives, and a VOC limit for aerosol adhesives of 75% by weight. Partial or complete exemptions are allowed in numerous cases as listed in Section 104 of the rule. The exemption for contact cements has been retained and VOC limitations for aerosol adhesives have been added.

The amended rule:

- Increased the VOC limit for thin metal laminating adhesive from 250 grams per liter to 780 grams per liter, since there are currently no adhesives available that meet the lower VOC limit.
- Added a 660 grams per liter limit for Perimeter Bonded Sheet Vinyl Flooring Installation Adhesive.
- Added a 400 grams per liter limit for Plastic Cement Welding.
- Updated standards and requirements for substrate preparation, cleanup activity and solvent stripping.
- Added new VOC standards and labeling requirements for aerosol adhesives for manufacturers and sellers to make the rule consistent with the standards proposed in the amendments to the Consumer Product regulations.
- Added recordkeeping and labeling requirements for aerosol adhesives.
- Removed the partial exemption for Contact Adhesives.

EXEMPTIONS:

A number of exemptions were also adopted, including:

- Aerosol cleaning solvents at the stationary source if the total usage of the aerosol cleaning solvents does not exceed 160 fluid ounces per day, averaged over a calendar month.

- Contact adhesives subject to the Consumer Product Safety Commission regulations in 16 Code of Federal Regulations, Part 1302, provided that adhesives are sold in packages of 128 fluid ounces or less.
- Cyanoacrylate Adhesives.
- Ethyl acetate when used to clean adhesive application equipment used in the manufacturing of transdermal drug delivery products, and fewer than 3 gallons per day of ethyl acetate, averaged over a calendar month, are used.
- Household adhesives that are regulated by the State of California and that are defined in Section 231 of the rule.
- Low Usage by a stationary source if the total combined volume of these materials used does not exceed 55 gallons during any calendar year. Commercial and industrial operations that use such materials and that are exempted pursuant to this section shall comply with Recordkeeping.
- Solvent welding operations used in the manufacturing of medical devices, including, but not limited to, catheters, heart valves, blood cardioplegia machines, tracheotomy tubes, blood oxygenators, and cardiatory reservoirs.
- Research and Development Operations where the testing and evaluation of materials in research and development laboratories, quality assurance laboratories, or analytical laboratories, if these sources maintain records that comply with Recordkeeping requirements.
- Tire Repair if the manufacturer labels such products: "For Tire Repair Only."
- Undersea Weapons for the manufacture, maintenance, or repair of undersea-based weapon systems.
- Ultraviolet Light-Cured Adhesives (reactive adhesives) that are cured through the application of ultraviolet light, electron beam, visible light, radio frequency, or microwaves.

RECORDKEEPING:

Recordkeeping required for those subject to this rule:

- Maintain a product list of used adhesive or sealant products, surface preparation solvents, cleanup solvents, or strippers on site, including the material's manufacturer, product name, and product number or code, classification according to the terminology used in Section 300 the material's VOC content as applied, the actual mixing ratio, if different from the manufacturer's recommendation, used in applying the material.
- **Monthly** records must be maintained and updated of the usage of each individual material.
- **Daily** records must be kept, by those using emission control equipment, showing the type and volume of coatings and solvents used and the key operating parameters including hours of operation, and routine and non-routine maintenance, in addition to records required as part of the Operation and Maintenance Plan and records of testing.

For further information, Rule 235, Adhesives, is available on the District's website at www.placer.ca.gov/apcd or feel free to contact District staff at 530-889-7130.