



If applicable, describe any of the project's areas of controversy known to the Lead Agency, including issues raised by agencies and the public.

Please see attached the areas of controversy.

Provide a list of the responsible or trustee agencies for the project.

There are no responsible agencies for the proposed project.

## Attachments to OPR Form F

**Project Title:** Proposed Amended Rule (PAR) 1168 – Adhesive and Sealant Applications

**Project Location:** The proposed project is located in the South Coast Air Quality Management District's (South Coast AQMD) jurisdiction, which includes the four-county South Coast Air Basin (all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties), and the Riverside County portion of the Salton Sea Air Basin and the non-Palo Verde, Riverside County portion of the Mojave Desert Air Basin.

**Project Description:** PAR 1168 proposes to: 1) prohibit the use of parachlorobenzotrifluoride (pCBtF) and tertiary-Butyl Acetate (t-BAc) due to toxicity concerns; 2) delay the effective dates of volatile organic compound (VOC) emission limits or maintain the existing VOC emission limits for certain categories of adhesives and sealants; 3) create additional subcategories of regulated products to better characterize and refine VOC emission limits; and 4) update and clarify rule language. PAR 1168 is expected to cause delayed and permanent foregone VOC emission reductions of 0.12 ton per day (tpd) and 0.28 tpd, respectively, due to extending the effective dates and maintaining the existing VOC limits for certain categories of regulated products. The Draft SEA concluded that significant and unavoidable adverse environmental impacts may occur for air quality during operation. No other significant adverse impacts were identified. Products subject to PAR 1168 may be used at facilities and other locations within the South Coast AQMD's Jurisdiction that may be identified on lists compiled by the California Department of Toxic Substances Control per Government Code Section 65962.5. However, the implementation of PAR 1168 will not alter the status of the facilities and other locations on the lists.

**Areas of Controversy:** The following table summarizes the Areas of Controversy.

	<b>Area of Controversy</b>	<b>Topics Raised by the Public</b>	<b>South Coast AQMD Evaluation</b>
1.	The effect of the pCBtF prohibition on Single Ply Roof Membrane Adhesives and All Other Roof Adhesives	Achieving the proposed VOC limits would not be possible without using pCBtF for formulations of these roofing products	<p>While some roofing products that were previously formulated with pCBtF will no longer allowed to be used if PAR 1168 is adopted, the following factors were considered:</p> <ol style="list-style-type: none"> <li>1) Currently, there are other roofing products commercially available on the market that are not formulated with pCBtF but have been demonstrated to comply with the previous VOC limits in effect prior to the October 6, 2017 amendments to Rule 1168 and these are the same VOC limits which are proposed in PAR 1168. Thus, no substantial interruption in the market supply of compliant roofing adhesives is expected.</li> <li>2) The long-term health benefit of prohibiting pCBtF, a toxic compound with substantial adverse carcinogenic health effects, would outweigh the short-term inconvenience associated with market shift of certain manufacturers pivoting from formulating roofing adhesives with pCBtF to those without pCBtF; and</li> <li>3) The proposed effective date of the prohibition includes three-year sell-through and four-year use-through provisions which will provide the manufacturer(s) sufficient time to phase out pCBtF.</li> </ol>
2.	The effect of the pCBtF prohibition on Clear, Paintable, and Immediately Water-Resistant Sealants	pCBtF is utilized to formulate Clear, Paintable, and Immediately Water-resistant Sealants to meet the existing VOC limit at 250 grams per liter (g/L)	<ol style="list-style-type: none"> <li>1) PAR 1168 includes a provision which delays implementation of the pCBtF prohibition by one year for sealants.</li> <li>2) The proposed effective date of the prohibition also includes a three-year sell through and a four-year use-through provision which will provide the manufacturer(s) sufficient time to phase out pCBtF.</li> <li>3) Other architectural sealants with water-resistant and/or water-proof capabilities are currently commercially available on the market that meet the 250 g/L VOC limit and that could replace formulations of this type of sealant containing pCBtF.</li> <li>4) The long-term health benefit of prohibiting pCBtF, a toxic compound with substantial adverse carcinogenic health effects, would outweigh the need to have a sealant that is both clear and paintable since these products are being used by consumers.</li> </ol>

	<b>Area of Controversy</b>	<b>Topics Raised by the Public</b>	<b>South Coast AQMD Evaluation</b>
3.	Request to exempt Opteon 1100 from the definition of VOC	The proposed VOC limits for High-Pressure and Low-Pressure Two-Component Foam Sealants cannot be achieved without formulating with Opteon 1100	<p>1) <i>The Office of Environmental Health Hazard Assessment (OEHHA)</i>, a specialized department within the California Environmental Protection Agency (CalEPA) with responsibility for evaluating health risks from environmental chemical contaminants, has not evaluated Opteon 1100. However, Opteon 1100 is a hydrofluoroolefin (HFO) which may have the potential to break down into perfluoroalkyl and polyfluoroalkyl substances (PFAS), commonly referred to as forever chemicals, through atmospheric degradation, and thus could have serious health impacts.</p> <p>2) Staff is considering this request to include a limited exemption in PAR 1168 that would allow the use of Opteon 1100 in High-Pressure Two-Component Foam Sealants used in a professional setting contingent on the results of an assessment by OEHHA.</p>