



THE **ADHESIVE AND SEALANT** COUNCIL, INC.

SECURING THE FUTURE®

April 12, 2021

Mr. Don Hopps, Supervisor SCAQMD

Dear Don Hopps:

On behalf of The Adhesive and Sealant Council (ASC) staff and Board of Directors, we wanted to thank you for meeting with our Regulatory Affairs Sub-Committee that is focused on VOC Limits for Aerosol Foam Sealants.

We believe the dialogue on Feb 18 was positive and hope that we were able to clarify the importance of segmenting foam sealant technologies and the variety and importance of understanding applications of all foam types we reviewed on the virtual call.

ASC and its members have created online resources on sustainability and the benefits of adhesive and sealants. That online resource and position on transparency can be found [here](#). We have also more recently created an online resources on adhesives and sealants used in vertical wall systems which includes a section dedicated to aerosol foam sealants which can be found [here](#).

ASC is asking SCAQMD to review the six asks that we shared with you in the Feb 18th Virtual call. Here there are again for your review. We would appreciate a communication back on these points below by May 15, 2021:

- 1) SCAQMD should update rule 1168 to read "Aerosol Foam Sealants250g/L"
 - **Definition:** Aerosol Foam Sealant: In building construction a sealant that expands in volume as it is dispensed from a container, using propellant under pressure, to form a rigid or semi-rigid cellular mass. Used to seal gaps less than 3 inches
- 2) Architectural Sealants.....<50 g/L
Definition: Category includes 2K-LP Sealants used to insulate & seal gaps greater than 3 inches.
- 3) 50g/L for Aerosol Foam Sealants is not justified based on the examples provided to ASC members from South Coast
- 4) Maintain 250g/L for Aerosol Foam Sealants. Delay implementation of 50 g/L for the overly broad "Foam Sealant" category until more dialogue with industry can be established and the rule correctly updated.
- 5) Recognize ASTM C717 Definition of Aerosol Foam Sealants. South Coast to formally document the importance of segmentation of Foam Sealant types & differences in physical properties and end uses for future reference.

- 6) Note in the rule that EPA Method 24 was NOT developed for Aerosol Foam Sealants, should not be used for Aerosol Foam Sealant VOC measurements, and it should not be used to establish a low-end threshold for our industry.

The following ASC Members with Aerosol Foam Sealants stakeholder interest support this letter:



Lisa Massaro DuPont 3/12/2021



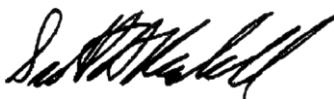
Joe Kravetz Tremco Inc 3/15/2021



Nicholas Barnes The Gorilla Glue Company 3/15/2021



Mary A. Sanger Franklin International 03/16/2021



Scott Reedell Soudal Accumetric 03/17/21



Neema Toolaabee DAP Products, Inc. 3/18/2021



Stephen Sicree Henkel Corporation 4/9/2021

Please don't hesitate to contact me should you have any questions (301-986-9700 x105).

Sincerely,



Steve Duren
Managing Director of Membership & Industry Programs