October 14, 2026

Heather Farr
Planning and Rules Manager
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

Re: Comments for Proposed Amended VOC Rule 1168-Preliminary Draft Rule Language

Dear Ms. Farr,

The Adhesive and Sealant Council, Inc. (ASC) appreciates the opportunity to provide comments to the South Coast Air Quality Management District on the Preliminary Draft Rule Language for Proposed Amended Rule 1168.

ASC is a trade association representing the North American adhesive and sealant value chain. The Council is comprised of 125 adhesive and sealant manufacturers, raw material and equipment suppliers, and distributors of all sizes, representing more than 75 percent of U.S.A. industry. Offering education, legislative advocacy, professional networking, and business growth solutions to its members, the ASC is the center of knowledge and a catalyst for industry growth on a global basis for manufacturers, suppliers, and end-users.

The Adhesive and Sealant Council supports South Coast AQMD's efforts to update Rule 1168 while encouraging the District to ensure that new compliance requirements are technically feasible, appropriately tailored, and supported by the available scientific and regulatory record. ASC offers the following preliminary comments and recommendations for the District's consideration.

1. Comments on Definitions

The definitions of "Distributor" and "Manufacturer" should be aligned with one another for clarity. "Manufacturer" specifies a Person, company, firm, or establishment while "Distributor" only specifies a Person. The lack of additional specified groups in "Distributor" could be interpreted as a misalignment, where only a single person can meet the definition of "Distributor". There are business cases where the Manufacturer is also the Distributor. It is not specified in the definitions that the Manufacturer's responsibility to comply with Rule 1168

overrides the Distributor classification. There are examples in other rules in which "Manufacturer" has been defined to include Person, company, firm, establishment, etc…, in addition to "Brand Owner" or "IP Owner". Adding clarification to the South Coast definition that the "Manufacturer" owns the brand or IP of the product may clarify the responsibility to comply with Rule 1168 in the case of multiple manufacturers, private labeling, and/or toll manufacturing.

The definition of Toll Manufacturer repeats the phrase "Regulated product". ASC recommends simplifying this definition to the following, "Toll manufacturer is a third-party manufacturer who produces regulated products for a private labeler."

In the definition of MIR, Title 17 CARB MIR Value code is referenced as the source for input into the PW-MIR calculation. There is no clarification in proposed amendments to Rule 1168 as to which version of MIR values are used. If MIR values are recalculated by CARB, updated MIR values may unintentionally push regulated products out of compliance for South Coast AQMD with no time allotted for reformulation or limit calculation. If CARB recalculates MIR values at a future date, MIR emission limits set by South Coast AQMD should be reevaluated for each product category, as well as amending Rule 1168 to maintain consistency between state and regional agencies.

ASC recommends adding the following language to the definition of MIR: "Title17, California Code of Regulations Sections 94700 and 94701, using MIR values as of October 2, 2010."

The definition of MIR uses g 03/ g VOC, referring to the units reported by CARB when defining each chemical or compounds' MIR value. The definition of PW-MIR includes a different unit (g 03/ g product). It is not explicitly stated that the MIR units (g 03/ g VOC) are converted into (g 03/ g product) by a calculation. Clarification should be made to eliminate opportunity for confusion by the public between the two units of measurement.

2. Comments on Proposed Restriction of VMS and DMC

ASC respectfully opposes the proposed restriction on cyclic, branched, or linear completely methylated siloxanes (VMS) and Dimethyl Carbonate (DMC). The proposed bans are without substantial scientific evidence or reasoning from other California chemical regulating agencies including OEHHA and the USEPA (e.g., Toxic Substances Control Act). This proposal deviates from standard South Coast AQMD processes and practices such as requesting technical assessments for all regulated products to obtain comprehensive understanding on the uses of such products within the District. A more targeted, risk-based approach would allow South Coast AQMD to address any air-quality or health concerns while avoiding restrictions that unnecessarily limit formulation options for manufacturers and products for consumers. ASC believes that any regulatory action should be based on assessment of the specific uses, concentrations, exposure pathways, and potential risks associated with their uses in adhesives and sealants.

3. Comments on applicability for Proposed Amended Rule 1168. Adhesive and Sealant Applications

(b) Applicability
"This rule applies to any person who uses or stores any adhesive, adhesive primers, sealants, or sealant primers in the South Coast AQMD……"

Storage is not use. If a product is only being stored in the district for reshipment elsewhere, it is not being applied or used, and therefore not contributing to any VOC emissions within the district. ASC recommends that the words "or stores" be deleted from this section.

3. Comments on Annual Reporting for US Distributors

ASC opposes the proposed modifications to recordkeeping that would require all Manufacturers and Private Labelers subject to this rule to provide a list of all their US distributors each calendar year. Manufacturers and Private Labelers should be required to provide information once, and update periodically, concerning Distributors that are located in, or sell or may sell regulated products into the South Coast AQMD. The QER structure does not require annual reporting, making this proposal inconsistent with South Coast AQMD reporting practices for QER.

4. Comments on Future Effective VOC Limits

ASC respectfully requests a modification to the proposed future VOC level (250 g/L) effective date of 01/01/2028 for the category of Clear, Paintable, and Immediately Water-Resistant (CPIWR) Sealants to the date of 01/01/2030. This would provide manufacturers and distributors with an appropriate business cycle timeline to reintroduce products to the marketplace, to educate and inform retail businesses and consumers about opportunities to utilize these products, and to avoid future marketplace disruptions. An alignment of future VOC levels for all three categories to the date of 01/01/2030 will provide consistency for South Coast AQMD with respect to continuing staff engagement with all adhesive and sealant categories, as opposed to the current piecemeal process. This recommended effective date of 01/01/2030 provides South Coast AQMD with the opportunity to conduct more comprehensive review of QER data to ensure greater accuracy for future regulatory modifications, to continue the Agency's commitment to engage with industry stakeholders to seek technical solutions that avoid elimination of adhesive and sealant categories, and to conduct a thorough technology assessment (market penetration, sales-weighted VOC information, manufacturer feedback, and product availability) for Clear, Paintable, and Immediately Water-Resistant Sealants that is consistent across all adhesive and sealant categories.

As South Coast AQMD is already aware, ASC remains in opposition to the VOC limit of 250 g/L for the Clear, Paintable, and Immediately Water-Resistant Sealants category. This level is unattainable for the unique performance in the specific applications for which they are intended despite thousands of research hours spent by industry attempting to successfully reach this compliance level.

In conclusion, the Adhesive and Sealant Council, Inc. appreciates South Coast AQMD consideration of the recommendations described above and looks forward to working constructively with the District as it continues its development of Proposed Amended Rule 1168.

Respectfully Submitted,

William E. Allmond
President