

**CURRENT STATUS OF VOC LIMIT IMPLEMENTATION UNDER THE
OZONE TRANSPORT COMMISSION:**

Date: September 13, 2011

States Affected:

| State | OTC 2000 Consumer Rule | OTC 2014 Consumer Rule (Proposed) | Industrial Adhesives Rule (Commercial Rule) |
|----------------------|--|--|---|
| Connecticut | Final regulation approved, effective date 1/1/09. | Under Evaluation | Rule is final. Effective date is Jan. 1, 2009. |
| Delaware | Final Rule in place, effective 1/1/05. | Will amend existing rule. | Rule is final. Effective date is May 1, 2009. |
| District of Columbia | Final Rule in place, effective 1/1/05. | Will review. | Final. Effective date is June 1, 2011. |
| Maine | Final Rule in place, effective 5/1/05. | No action to date | Final adoption. Effective Date is 1/1/11. |
| Maryland | Final Rule in place, effective 1/1/05. | Under review. | Rule is final. Effective date is Jan. 1, 2009. |
| Massachusetts | Final Rule in place, effective date 1/1/09. | No action to date. | Daft rule still in internal review stage. No movement as of 9/13/11. |
| New Hampshire | Final Rule in place, effective 1/1/07. | Under review. | Draft rule under development. On hold as of 5/9/11. |
| New Jersey | Final Rule in place, effective 1/1/05. | No action to date. | Rule is final. Effective date is Jan. 1, 2009. |
| New York | Final Rule in place, effective 1/1/05. | Under development. | Final rule. Effective date is January 1, 2011. Has a one-year sell-through of product made before that date up to Jan. 1, 2012. |
| Pennsylvania | Final Rule in place, effective 1/1/05. | No action to date. | Final version published 12/25/2010. Effective date is January 1, 2012. Has a sell-thru of 2011 dated product. |
| Rhode Island | Rule Final. Goes into effect 1/1/09. | No action to date. | Rule is final. Effective Date is July 1, 2009. |
| Vermont | No plan to adopt. | No action to date. | Plan to pursue. |
| Virginia | Final Rule in place, effective 7/1/05. In effect for following counties only: Arlington, Fairfax, Loudoun, Stafford, Prince William, Spotsylvania, & Fredericksburg City. | No action to date. | Final Rule. Effective August 1, 2010. In effect for following counties only: Arlington, Fairfax, Loudoun, Stafford, Prince William, Spotsylvania, & Fredericksburg City. |

Other States with Consumer Product Rules:

| State | Consumer Rule | Comment |
|-------------------|---------------------------------|---|
| Michigan (LADCO) | Rule Final. Effective 1/1/07. | Same as OTC Rule |
| Ohio (LADCO) | Rule Final. Effective 1/1/09. | Same as OTC Rule |
| Indiana (LADCO) | Rule Final. Effective 6/1/2011. | Construction adhesive limit is 7% by weight (~75 g/L). Caulks are 4% by weight (~60 g/L). |
| Illinois (LADCO) | Rule Final. Effective 7/1/09. | Same as OTC Rule. |
| Wisconsin (LADCO) | Draft rule only at this point. | Rule AM-11-09 for Industrial Adhesives |
| California (CARB) | Rule in effect. | Revision on Construction adhesive limits (7%) effective 1/1/09. Reactive Caulk limit (3%) effective 1/1/13. Non-reactive caulk limit (1.5%) effective 1/1/11. |

Federal EPA Consumer Products Rule update has been abandoned for now. Will have to wait and see what the administration chooses to do.

Georgia: Has a proposed rule out to regulate industrial and commercial uses of adhesives for a 20 county area around Atlanta. Construction adhesives would be regulated at a ~200 g/L. Proposed implementation is 2013.

Texas: Has a proposed rule for the Dallas/Fort Worth and Houston/Galveston areas of the state to regulate commercial sizes of adhesives to the OTC Commercial rule limits. Not expected to be final before 2013.

RULES:

OTC 2005 Consumer Products Rule

Note: Covers containers of 16 ounces or less except contact cement which is one gallon or less.

| | | |
|---|-----|----------|
| Construction, Panel and Floor Covering Adhesive | 15% | ~200 g/L |
| Contact Cement Adhesive | 55% | ~600 g/L |
| General Purpose Adhesive | 10% | ~120 g/L |
| Sealants and Caulking Compounds | 4% | ~60 g/L |

OTC 2014 Consumer Products Rule (Proposed)

| | | |
|---|-----|----------|
| Construction, Panel and Floor Covering Adhesive | 7% | ~75 g/L |
| Contact Cement Adhesive | 55% | ~600 g/L |
| General Purpose Adhesive | 10% | ~120 g/L |
| Sealants and Caulking Compounds | 4% | ~60 g/L |

OTC 2009 Industrial/Commercial Adhesives Rule

Note: Industrial/Commercial Adhesives Rule is basically the California RACT/BARCT Rule. Applies to containers over 16 ounces and contact cements over one gallon.

| | |
|------------------------------------|---------|
| Contact Bond Adhesive | 250 g/L |
| Cove Base Installation | 150 g/L |
| Indoor/Outdoor Floor Covering | 150 g/L |
| Multipurpose Construction Adhesive | 200 g/L |
| Outdoor Floor Covering | 250 g/L |
| Porous Substrates (Wood to Wood) | 120 g/L |
| Architectural Sealants | 250 g/L |

Changes for Individual States (LADCO)

| | |
|-----------|---|
| Illinois | Same as OTC 2005 Rule |
| Indiana | Follows the OTC 2014 Rule [Construction Adhesives down to 7% by weight (75 g/L)] |
| Michigan | Same as OTC 2005 Rule |
| Ohio | Same as OTC 2005 Rule |
| Wisconsin | Don't know yet. |

California Consumer Products VOC limits (CARB)

Note: Applies statewide to containers of 16 ounces or less and contact cements of one gallon or less.

| | | |
|---|------|------------------------|
| Construction, Panel and Floor Covering Adhesive | 7% | ~75 g/L |
| Contact Cement Adhesive | 55% | ~600 g/L |
| General Purpose Adhesive | 10% | ~120 g/L |
| Sealants and Caulking Compounds | | |
| Chemically Curing Compounds (Reactive) | 4% | ~60 g/L (to 12/31/12) |
| | 3% | ~45 g/L (after 1/1/13) |
| Non-Chemically Curing Compounds (Non-reactive) | 1.5% | ~25 g/L |

California Industrial/Commercial Product VOC limits

Note: Covers products in containers greater than 16 ounces and one gallon for contact cements. In California each of the 36 Air Districts can set their own VOC limits. Fourteen (14) of them have done that. The listing below is for the South Coast Air Quality Management District's Rule 1168 which covers the Los Angeles area of California (Counties of Orange, Los Angeles, Riverside and San Bernardino). It is currently represents the strictest VOC limits in the world.

| | |
|--|---------|
| Wood Flooring Adhesive | 100 g/L |
| Cove Base Installation | 50 g/L |
| Indoor Carpet Adhesive | 50 g/L |
| Outdoor Carpet Adhesive | 150 g/L |
| Carpet Pad Adhesive | 50 g/L |
| Multipurpose Construction Adhesive | 70 g/L |
| Subfloor, Drywall and Panel Adhesive | 50 g/L |
| Ceramic Tile Adhesive | 65 g/L |
| Porous Substrates (Wood to Wood) | 120 g/L |
| Contact Cement | 80 g/L |
| Architectural Sealants | 250 g/L |
| * Maximum Product VOC (unless otherwise specified) | 250 g/L |

Map of VOC States