

VOC Regulations for Adhesives and Sealants

Common Questions and Answers

The Ozone Transport Commission (OTC), which is made up of 13 Northeast and mid-Atlantic states developed a model rule to reduce VOC limits in an effort to meet the clean air requirements set by the Environmental Protection Agency (EPA).

What are VOC's?

VOC stands for Volatile Organic Compound. The main purpose of VOC Regulations is to reduce the formation of ozone (smog). Several states have adopted rules to regulate the VOC content of all types of products including single-ply roofing adhesives, sealants and primers.

Which states are affected?

Adoption of VOC regulations and dates these regulations go into effect vary by state. See enclosed list for specifics.

Which products are impacted by these new regulations?

Today, many of the Carlisle products we have had for years already comply with the OTC Model Rule or have compliant alternatives. Carlisle is also working diligently to develop new and improved compliant alternatives. A complete list of affected Carlisle products and alternatives is included below.

Standard Product	Compliant Alternative
Sure-Seal® Bonding Adhesive	Aqua Base 120 or EPDM Low VOC Bonding (under development)
Sure-Weld® Bonding Adhesive	Aqua Base 120 or TPO Low VOC Bonding
Sure-Flex™ Bonding	Aqua Base 120 or PVC Low VOC Bonding (under development)
EP-95 Splice Cement	FAT or SecureTAPE™
Sure-White® Splice Cement	FAT or SecureTAPE
P-30 Splice Cement	FAT or SecureTAPE
HP 250 - 1 or 2.5 gallons cans	LV 600 or HP 250 in 1 pint cans or EPDM Low VOC Primer (under development)
TPO Primer	TPO Primer in pint cans or TPO Low VOC Primer (under development)
CCW 702	Cav-Grip or CCW 702 LV

Products packaged in 16-oz. or smaller tubes or bottles are exempt

How do the new regulations impact my business?

The language varies somewhat by state but essentially applies to any person who, on and after the effective date, sells, offers for sale, supplies or uses an adhesive, sealant or primer that does not meet the VOC content limits set forth in the regulation. For bidding purposes, compliant products under development may

often carry a price premium of up to 50% over traditional solvent-based adhesives. Please contact your local Carlisle representative or distributor regarding pricing and availability.

When do the regulations go into effect?

Through the efforts of both the EPDM Roofing Association (ERA) and Carlisle, a number of the OTC member states have agreed to a “phase-in” period for the years 2009 through 2011. States that have yet to implement the rule are also being asked to include a “phase-in” period to cover 2010 and 2011. This “phase-in” period is to allow for successful development of compliant solvent-based alternatives prior to full year OTC Model Rule enforcement in 2012. The following table includes states that have already implemented the rule and the effective dates for 2009 through 2011. During these time periods, products that meet the OTC Model Rule requirements must be used in that respective state. OTC member states not appearing in this table have yet to implement the rule.

Effective Dates			
State	2009	2010	2011
Connecticut	June 1 st - August 31 st	May 1 st - September 30 th	May 1 st - September 30 th
DC	June 1 st - August 31 st	May 1 st - September 30 th	May 1 st - September 30 th
Maryland	May 15 th - September 15 th	May 1 st - September 30 th	May 1 st - September 30 th
New Jersey	June 1 st - August 31 st	May 1 st - September 30 th	May 1 st - September 30 th
Rhode Island	July 1 st - August 31 st	May 1 st - September 30 th	May 1 st - September 30 th

(RI has an exemption for products manufactured prior to July 1, 2009)

At this time, all states adopting the OTC rule will require full year compliance on and after January 1, 2012.

If work is planned in any of the OTC member states, it is critical to keep abreast of the time periods when Low VOC products are required for use by that specific state’s regulation.

Please refer to these links for complete and current information on VOC regulations.

OTC (Ozone Transport Commission): www.otcair.org

Connecticut: www.ct.gov/dep/lib/dep/regulations/22a/22a-174-1through200.pdf

MD: www.mde.state.md.us/assets/document/air/publichearing/26-11-35_AS_Roofing_Adhesives_TSD.pdf

New Jersey: www.nj.gov/dep/aqm/Sub24,26,34adoption2008.doc (pgs 44-47)

Rhode Island: www.dem.ri.gov/programs/benviron/air/pdf/dr44fs.pdf

Additional information and current status of state implementation dates can be found at www.epdmroofs.org

Carlisle is committed to providing our customers with the products and services they need for their commercial roofing projects. Thank you for choosing Carlisle for your commercial roofing needs.