

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

| Standard Product | Compliant Alternative |
|--------------------------------------|--|
| G200SA Yellow Substrate Adhesive | AquaBase 120 or EPDM Low VOC Bonding (under development) |
| VersiWeld Bonding Adhesive | AquaBase 120 or TPO Low VOC Bonding |
| PVC Bonding Adhesive | AquaBase 120 or PVC Low VOC Bonding (under development) |
| Splice Adhesive (Black) | VersiGard w/ QAT or QA Seam Tape |
| G100SA White Splice Cement | VersiGard w/ QAT or QA Seam Tape |
| P-30 Splice Cement | VersiGard w/ QAT or QA Seam Tape |
| V-150 Primer – 1 or 2.5 gallons cans | LV 600 or V-150 Primer 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 Versico 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 Versico, 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/agm/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

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