Winston H. Hickox
Secretary for Environmental Protection

Air Resources Board

Alan C. Lloyd, Ph.D.
Chairman
2020 L Street • P.O. Box 2815 • Sacramento, California 95812 • www.arb.ca.gov

Gray Davis
Governor

March 3, 1999

Dear Sir/Madam:

Enclosed please find a copy of the Air Resources Board's (ARB) 1998 Aerosol Adhesives Survey (survey). The survey is intended to assist manufacturers and responsible parties in fulfilling the special reporting requirements in California's Consumer Product Regulations, Title 17, California Code of Regulations, section 94513(d), regarding aerosol adhesives that are marketed in California.

The special reporting requirements specify that each manufacturer or responsible party submit to the Executive Officer of the Air Resources Board (ARB) a written report of 1998 California sales and formulation data for each aerosol adhesive product by March 31, 1999. The regulations also specify that, by the same date, manufacturers shall submit a written report of research and development efforts undertaken to achieve the regulations' December 31, 2002, standard of 25% volatile organic compounds (VOCs).

The information you provide in the survey will assist the ARB staff in determining the technical feasibility of the 25% VOC standard. Also, the information will be used if necessary to determine an alternative standard(s) that represents best available retrofit control technology (BARCT) for aerosol adhesives.

We request that you use the survey to submit your aerosol adhesive products information as described. The deadline for requesting all data and information has been extended to **May 1, 1999**. The survey contains detailed instructions and questions and answers for your assistance.

If you have any questions concerning this letter or the survey, please contact Ms. Linda Lee, Air Resources Engineer, at (916) 327-1514 (e-mail llee@arb.ca.gov), or Ms. Kim Nguyen, Air Resources Engineer, at (916) 327-1513 (e-mail knguyen@arb.ca.gov).

Sincerely,

Dean C. Simeroth, Chief
Criteria Pollutants Branch

Enclosures

QUESTIONS AND ANSWERS REGARDING AEROSOL ADHESIVES SURVEY

1. What is an aerosol adhesive?

The Consumer Products Regulations defines both "adhesive" and "aerosol adhesive." Section 94508, CCR, defines "adhesive" as any product that is used to bond one surface to another by attachment. The definition of "aerosol adhesive" is contained within the "adhesive" definition. An aerosol adhesive is an aerosol product in which the spray mechanism is permanently housed in a nonrefillable can designed for hand-held application [32 ounces or less] without the need for ancillary hoses or spray equipment. "Aerosol product" is defined as a pressurized spray system that dispenses product ingredients by means of a propellant or mechanically induced force.

2. What is a "Responsible Party?"

The "Responsible Party" is the company, firm, or establishment which is listed on the label. If the label lists two companies, firms, or establishments, the responsible party is the party which the product was "manufactured for" or "distributed by," as noted on the label.

3. Must I still complete this survey form if I am not a Responsible Party?

Yes, even if you are not a Responsible Party, please complete the top portion of **Form I: Company Information** and return this form to the following address:

California Air Resources Board
Stationary Source Division
Aerosol Adhesives Survey
P.O. Box 2815
Sacramento, CA 95812

For your convenience, the back of this form is already addressed and metered for postage. After completion, the form can be tri-folded, sealed, and dropped in the mail. You do not have to fill out any of the other forms.

4. If I have already filled out previous consumer product surveys, must I still complete this survey?

Yes, you must still fill out this entire survey if you are a responsible party for an aerosol adhesive. The information requested in this survey is required by law. The ARB will be using this information to evaluate the VOC standard for aerosol adhesives contained in the Consumer Product Regulations.

6. If the survey information is claimed as confidential, how will it be treated?

The ARB has adopted regulations to protect the confidentiality of trade secrets (Title 17, CCR, sections 90111 to 91022). A summary of ARB confidentiality regulations can be found in Attachment C of the survey package. You should fill out this form if you wish to designate any survey information as confidential. All information which you designate as confidential will be

handled strictly in accordance with ARB confidentiality regulations. In order to ensure that information deemed confidential is clearly identified, we have provided a box at the top of each page of the survey form to be checked if confidential information is provided on that page. The ARB has many years of experience in handling confidential information and takes its responsibilities very seriously. All confidential information will be kept in locked file cabinets and will be accessible to authorized ARB staff on an "as needed" basis only.