



Adhesive Remover in California

Environmental, Health and Safety Bulletin, May 2009

Purpose	The purpose of this bulletin is to provide a basic understanding of volatile organic compound (VOC) rules in California as the rules relate to 3M™ Adhesive Remover products from the Industrial Adhesives and Tapes Division.
Introduction	To understand the VOC rules in California, it is important to understand the various definitions of terms. This bulletin will provide definitions as provided by the regulating agencies and 3M's interpretation of the VOC rules as they relate to 3M™ Adhesive Remover.
Background Information	<p>VOCs include solvents used as carriers in cleaners, paints, coatings, and adhesives. When VOCs are emitted into the air, they react with nitrogen oxides (NO_x) in the presence of sunlight to produce ground-level ozone (O₃). Above certain concentrations in the air, ozone can have health and environmental effects.</p> <p>The federal Environmental Protection Agency (EPA) has published standards, pursuant to the federal Clean Air Act, for nitrogen oxides and ozone concentrations in air that all states are required to meet. If a state or region does not meet these standards, the state or region is required to develop plans to meet these standards. One of the methods used to meet the federal ozone standard is the development and implementation of VOC emission standards for facilities and products.</p> <p>Regions of the state of California do not meet the federal ozone standards. As a result, state and regional air districts have developed regulations to reduce VOC emissions throughout the state.</p> <p>California's product VOC regulations are divided into two categories, industrial rules and consumer/institutional rules. The industrial rules are written and enforced by each of the 35 separate, independent, local air quality districts and apply only to the districts in which they were written. The consumer/institutional rules are written and enforced by the California Air Resources Board (CARB) and apply statewide. The result of this organization can be confusing and sometimes creates what appear to be conflicting rules. For example, a product may be usable in an industrial facility within a district but may not be allowed for consumer/institutional use or vice-versa. To further complicate matters, the consumer/institutional rules are mostly product-specific, while the industrial rules are a blend of product limits and application limits.</p>
What uses fall under CARB's consumer products rule?	<p>Please note that CARB's regulatory definition of "consumer product" under its Consumer Products Rule is much broader than the layman's definition; it includes products used by institutional customers and may include products used in industrial settings. Please see the regulatory definitions below, from CARB's Consumer Products Rule. For CARB's advisory on consumer, institutional, and industrial products definitions, please see http://www.arb.ca.gov/enf/advs/advs307.pdf.</p> <p>"Consumer Product" means a chemically formulated product used by household and institutional consumers including, but not limited to, detergents; cleaning compounds; polishes; floor finishes; cosmetics; personal care products; home, lawn, and garden products; disinfectants; sanitizers; aerosol paints; and automotive specialty products; but does not include other paint products, furniture coatings, or architectural coatings. As used in this article, the term "consumer product" shall also refer to aerosol adhesives, including aerosol adhesives used for consumer, industrial, and commercial uses.</p> <p>"Household Product" means any consumer product that is primarily designed to be used inside or outside the living quarters or residences that are occupied or intended for occupation by individuals, including the immediate surroundings.</p> <p>"Institutional Product" or "Industrial and Institutional (I&I) Product" means a consumer product that is designed for use in the maintenance or operation of an</p>



Adhesive Remover in California

	<p>establishment that: (A) manufactures, transports, or sells goods or commodities, or provides services for profit; or (B) is engaged in the nonprofit promotion of a particular public, educational, or charitable cause. "Establishments" include, but are not limited to, government agencies, factories, schools, hospitals, sanitariums, prisons, restaurants, hotels, stores, automobile service and parts centers, health clubs, theaters, or transportation companies. "Institutional Product" does not include household products that are incorporated into or used exclusively in the manufacture or construction of the goods or commodities at the site of the establishment.</p> <p>Title 17, California Code of Regulations, Subchapter 8.5, Article 2, Section 94508 Available on-line from http://arbis.arb.ca.gov/consprod/regs/regs.htm</p>
<p>How has CARB defined an adhesive remover?</p>	<p>"Adhesive Remover" means a product designed to remove adhesive from either a specific substrate or a variety of substrates. "Adhesive Removers" do not include products that remove adhesives intended for use on humans or animals.</p> <p>For the purpose of this definition and "Adhesive Remover" subcategories (A-D), the term "adhesive" shall mean a substance used to bond one or more materials. Adhesive includes, but is not limited to: caulks; sealants; glues; or similar substances used for the purpose of forming a bond.</p> <p>(A) "Floor or Wall Covering Adhesive Remover" means a product designed or labeled to remove floor or wall coverings and associated adhesive from the underlying substrate.</p> <p>(B) "Gasket or Thread Locking Adhesive Remover" means a product designed or labeled to remove gaskets or thread locking adhesives. Products labeled for dual use as a paint stripper and gasket remover and/or thread locking adhesive remover are considered "Gasket or Thread Locking Adhesive Remover."</p> <p>(C) "General Purpose Adhesive Remover" means a product designed or labeled to remove cyanoacrylate adhesives as well as non-reactive adhesives or residue from a variety of substrates. "General Purpose Adhesive Remover" includes, but is not limited to, products that remove thermoplastic adhesives; pressure sensitive adhesives; dextrine or starch-based adhesives; casein glues; rubber or latex-based adhesives; as well as products that remove stickers; decals; stencils; or similar materials. "General Purpose Adhesive Remover" does not include "Floor or Wall Covering Adhesive Remover."</p> <p>(D) "Specialty Adhesive Remover" means a product designed to remove reactive adhesives from a variety of substrates. Reactive adhesives include adhesives that require a hardener or catalyst in order for the bond to occur. Examples of reactive adhesives include, but are not limited to: epoxies; urethanes; silicones. "Specialty Adhesive Remover" does not include "Gasket or Thread Locking Adhesive Remover."</p> <p>Title 17, California Code of Regulations, Subchapter 8.5, Article 2, Section 94508 Available on-line from http://arbis.arb.ca.gov/consprod/regs/regs.htm</p>
<p>What VOC limits has CARB established for adhesive removers?</p>	<p>CARB has established VOC limits for the four subcategories of Adhesive Remover. These limits are</p> <ul style="list-style-type: none">• Floor or Wall Covering Adhesive Remover – 5% by weight• Gasket or Thread Locking Adhesive Remover – 50% by weight• General Purpose Adhesive Remover – 20% by weight• Specialty Adhesive Remover – 70% by weight <p>These limits went into effect on December 31, 2006. Product that does not meet these limits but was manufactured before the effective date may be sold for up to three years after the effective date (i.e., until December 31, 2009). There is a date code on the can that may be used to determine date of manufacture.</p> <p>Title 17, California Code of Regulations, Subchapter 8.5, Article 2, Section 94509 Available on-line from http://arbis.arb.ca.gov/consprod/regs/regs.htm</p>



Adhesive Remover in California

What is the VOC content of 3M™ Adhesive Remover?	The VOC content of 3M™ Adhesive Remover is 100%. This includes the Adhesive Remover Pen, Aerosol, and Bulk products.
What about industrial uses of adhesive removers?	<p>Because industrial use is regulated by the individual air quality management district, the rules can vary depending on geographic location. For example, in the South Coast Air Quality Management District (SCAQMD), whether or not this product is restricted depends on its use. Stripping of cured adhesives or certain other activities may be exempt from the provisions of SCAQMD Rule 1171, but any exemptions need to be evaluated on a case-by-case basis.</p> <p>See, for example, South Coast Air Quality Management District Rule 1171, Solvent Cleaning Operations. Available on-line at http://www.aqmd.gov/rules/reg/reg11/r1171.pdf</p> <p>For other districts, consult your local air quality regulations and any applicable facility air permits for your operations to determine if you have restrictions on the industrial use of 3M™ Adhesive Remover.</p>
Interpretation	Use of 3M™ Adhesive Remover may be restricted in California depending upon your application and geographic location.
Sales Prohibition	<p>Both the consumer and industrial rules may prohibit certain sales of non-compliant products within the state of California. However, this prohibition does not prevent a distributor from having non-compliant product in inventory, as long as the non-compliant product is sold to a customer located where the product is compliant or the use is exempt. Record-keeping rules may apply.</p> <p>Title 17, California Code of Regulations, Subchapter 8.5, Article 2, Section 94510 Available on-line at http://arbis.arb.ca.gov/consprod/regs/regs.htm</p>
What about other states?	Other states may have VOC rules. Certain northeastern, mid-Atlantic, and Midwestern states have the same VOC limits for adhesive removers as does CARB. Because adoption of VOC rules by these states is ongoing, the individual state rules should be consulted to understand potential restrictions.

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