



July 29, 2024

Re: Informal Comment on Rulemaking for Industrial Adhesive VOC Content Limits- RPN 2024-024-115-AI

Dear Texas Commission on Environmental Quality (TCEQ),

I am writing to comment on the proposed amendments to the industrial adhesive VOC content limits in 30 TAC Chapter 115, which aim to correct inadvertently excluded and incorrectly amended limits from the 2023-116-115-A rulemaking.

Recommendations to Enhance Compliance and Public Health Protection:

- Align with [EPA Guidance](#):
 - VOC Content Limits: Adopt specific limits from the EPA's Control Techniques Guidelines (CTG) for Miscellaneous Industrial Adhesives. For example:
 - Adhesives: ≤ 30 grams/liter for general and ≤ 70 grams/liter for contact adhesives
 - Adhesive Primers: ≤ 250 grams/liter
 - Application Methods: Recommended systems use brush, roll coat, and automated spray application methods that ensure minimal VOC emissions.
- Enhanced Monitoring and Testing:
 - Implement Continuous Emissions Monitoring Systems (CEMS) that use gas analyzers, sample probes, and data acquisition systems to measure VOC concentrations continuously.
 - Incorporate photoionization detectors (PID) and flame ionization detectors (FID) for accurate VOC detection.
 - Require regular performance tests to ensure monitoring equipment functions correctly and accurately.
- Specific Work Practices and Approved Systems:
 - Work Practices: Include proper ventilation, covered storage for VOC-containing materials, and regular maintenance of application equipment.
 - Application Systems: Use low-VOC or VOC-free adhesives and spray equipment that meets high-efficiency transfer standards.
- Stricter Recordkeeping and Reporting:
 - Require detailed logs of VOC usage, emissions, and maintenance, ensuring transparency and accountability.

- Close Loopholes:
 - Emergency Releases: Establish stricter regulations for VOC emissions during emergencies, including mandatory reporting and immediate corrective actions.
 - Exemptions for Specific Processes: Remove or minimize exemptions for certain industrial processes that allow significant VOC emissions without regulation.
 - Small Facility Exemptions: Ensure that small facilities cumulatively contribute to VOC emissions are also subject to monitoring and control measures.
 - Geographical Loopholes: The regulations should uniformly cover all regions within Texas without exempting certain areas.

- Public Engagement and Education:
 - Engage local communities, especially vulnerable populations, in monitoring and decision-making processes, and launch educational initiatives on the benefits of low-VOC products.
 - Incentives and Support: Provide grants, tax incentives, and technical assistance to facilities transitioning to low-VOC adhesives and adopting new technologies.

These measures will make it easier for TCEQ to enforce regulations, protect public health, reduce 8-hour ozone levels, and enhance transparency in the air permitting process.

Thank you for considering these recommendations.

Sincerely,

Sarah Mercer
Founder, Texans For Environmental Awareness
sarah@txenviromatters.com