



IMPROVING AIR QUALITY BY REGULATING ROOFING PRODUCTS

The Connecticut Department of Environmental Protection (DEP) has recently adopted a number of regulations to limit the amount of volatile organic compounds (VOC) contained in consumer and industrial products. Two of these regulations impact Connecticut's roofing industry. Section 22a-174-41 of the Regulation of Connecticut State Agencies (RCSA) was adopted on July 26, 2007 and regulates architectural and industrial maintenance coatings. RCSA section 22a-174-44 was adopted on October 3, 2008 and regulates a variety of adhesives, sealants and primers. Reducing VOC, precursors of harmful ground-level ozone, assists Connecticut to comply with federal health-based standards for ozone and provides important public health benefits.

Both regulations apply to the manufacture, sale and use of the regulated products, which means that anyone engaging in any of these activities must take action to meet the applicable regulatory requirements in the designated timeframe. The main requirements of the two regulations are summarized here. See the text of the regulations to understand all the requirements that may be pertinent.

Roof Coatings

RCSA section 22a-174-41 regulates the sale, manufacture and use in Connecticut of over 50 categories of architectural coatings, including enamels, stains, varnishes, shellacs and waterproofing sealers. Three products specific to roofing are regulated, as follows:

"Bituminous roof coating" means a coating that incorporates bitumens that is labeled and formulated exclusively for roofing.

"Bituminous roof primer" means a primer that incorporates bitumens that is labeled and formulated exclusively for roofing.

"Roof coating" means a non-bituminous coating labeled and formulated exclusively for application to roofs for the primary purpose of preventing penetration of the substrate by water or reflecting heat and ultraviolet radiation.

VOC content limits

Manufacturers, distributors, retail sellers and users must sell or use only products that meet the following VOC content limits:

<i>Category</i>	<i>As applied VOC content limit (g VOC/L)</i>
Bituminous roof coatings	300
Bituminous roof primers	350
Roof coatings	250

Schedule for compliance

The requirements, including the VOC content limits, apply to products manufactured on and after May 1, 2008.

- Any product manufactured prior to May 1, 2008 may be sold, supplied or offered for sale until May 1, 2011.
- Any product manufactured prior to May 1, 2008 may be applied at any time.

Single-Ply Roofing Adhesives, Sealants and Adhesive Primers

RCSA section 22a-174-44 regulates the sale, manufacture and use in Connecticut of over 40 categories of adhesives, sealants, adhesive primers and sealant primers, primarily those used in industrial settings and architectural trades. Requirements to limit the VOC content of surface preparation solvents are also included. Three categories of single-ply roofing products are regulated.

VOC content limits

Manufacturers, distributors, retail sellers and users must sell or use only products that meet the following VOC content limits:

<i>Category</i>	<i>As applied VOC content limit (g VOC/L)</i>
Single-ply roof membrane installation or repair adhesive	250
Single-ply roof membrane sealant	450
Single-ply roof membrane adhesive primer	250

Schedule for compliance

Users of single-ply roof membrane products have a phased-in compliance schedule, which requires the use of low-VOC roof products only in summer months in 2009, 2010 and 2011, as follows:

For 2009: June 1 through August 31

For 2010 & 2011: May 1 through September 30

Beginning on January 1, 2012, products that meet the VOC content limits must be used at all times.

Prior to January 1, 2012, manufacturers, distributors and retail sellers may sell any single-ply roof membrane installation or repair adhesive, single-ply roof membrane sealant or single-ply roof membrane adhesive primer, regardless of VOC content.

On and after January 1, 2012, only products that meet the VOC content limits may be sold.

For More Information

This fact sheet does not include all the information necessary to guarantee compliance. The full text of RCSA sections 22a-174-41 and 22a-174-44 and other Connecticut air quality regulations are available on DEP's website at the following location:

http://www.ct.gov/dep/cwp/view.asp?a=2684&q=322184&depNav_GID=1619

To track new regulatory proposals and public participation opportunities, see DEP's website at the following location: http://www.ct.gov/dep/cwp/view.asp?a=2684&q=331220&depNav_GID=1619

To speak to a person about the air quality regulations: Call Ric Pirolli at 860-424-3450 or Merrily Gere at 860-424-3416.

To pose a question in writing: Send an electronic message to merrily.gere@ct.gov