



Center for the  
Polyurethanes Industry

October 26, 2015

Submitted via Electronic Docket

California Air Resources Board  
1001 I Street  
Sacramento, CA 95841

**RE: Public Comments on Draft Short-Lived Climate Pollutant Reduction Strategy**

Dear Board Members,

The American Chemistry Council's Center for the Polyurethanes Industry<sup>1</sup> (CPI) and Spray Foam Coalition<sup>2</sup> (SFC) appreciate the opportunity to comment on the California Air Resources Board's (CARB) Draft Short-Lived Climate Pollutant (SCLP) Reduction Strategy (Draft Strategy). CPI and SFC represent the polyurethane industry value chain, including raw material suppliers and manufacturers of spray polyurethane foam (SPF) systems.

The polyurethane foam insulation industry is committed to continuing the manufacture of products that have low environmental impacts during the manufacturing process and provide energy and greenhouse gas (GHG) savings over their life cycle. This commitment includes using established research and development processes to transition to the use of low-global warming potential (GWP) blowing agents that meet product-specific technical requirements.

The Draft Strategy correctly notes that national and international agreements present the best ways to reduce SCLP emissions. Moreover, we agree with the conclusion in the Draft Strategy

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<sup>1</sup> The Center for the Polyurethanes Industry (CPI) of the American Chemistry Council serves as the voice of the polyurethanes industry in North America, promoting its development and coordinating with polyurethane trade associations across the globe. CPI members are companies that produce and sell the raw materials and additives that are used to make polyurethane products, equipment used in the manufacture of polyurethanes, and companies engaged in end-use applications and the manufacture of polyurethane products.

<sup>2</sup> The Spray Foam Coalition (SFC) champions the use of spray polyurethane foam in U.S. building and construction applications and promotes its economic, environmental and societal benefits while supporting the safe manufacture, transport, and application of spray polyurethane foam. SFC consists of manufacturers of spray polyurethane foam systems as well as suppliers of raw materials and machinery used to apply the foam.



that any measures to restrict the use of high-GWP blowing agents for SPF products will be more effective and efficient at the Federal level.

As highlighted in the Draft Strategy, numerous national and international efforts are currently underway to reduce SLCP emissions, including emissions of hydrofluorocarbons (HFCs). For example, the U.S. Environmental Protection Agency (EPA) issued a final rule in July 2015 that restricts the use of high-GWP blowing agents in many end uses.<sup>3</sup> President Obama also recently praised the private-sector for “ambitious” voluntary commitments and “robust” progress to reducing HFC emissions.<sup>4</sup> It is evident that regulatory and voluntary actions are well underway to reduce SLCP emissions, and therefore we believe that any state-level restrictions on the use of high-GWP blowing agents in SPF end uses would be duplicative.

SPF products are a valuable building product and can help California meet other climate-focused goals. With respect to buildings, the state has set ambitious goals for improving energy efficiency. The California Energy Commission is working toward the goal of zero net energy for all new residential construction by 2020.<sup>5</sup> Governor Brown recently signed legislation aimed at increasing energy efficiency for existing buildings in the state.<sup>6</sup> SPF insulation is expected to play a central role in helping the construction market achieve these goals.

SPF products are typically selected for their excellent thermal performance and versatility as an air and vapor barrier. The energy savings resulting from use of these products over their life cycle can be many times greater than the amount of energy used to manufacture and produce the products. For example, closed-cell SPF insulation helps save the equivalent GHG emissions associated with its manufacturing process in as little as three to eight years by reducing the energy used to heat and cool homes.<sup>7</sup> CARB should carefully select its SLCP emission reduction strategies to ensure that actions do not have the unintended consequences of deselecting energy efficiency products like SPF insulation.

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<sup>3</sup> 40 CFR Part 82, Change of Listing Status for Certain Substitutes Under the Significant New Alternative Policy Program (Final Rule 20).

<sup>4</sup> White House Fact Sheet: Obama Administration and Private-Sector Leaders Announce Ambitious Commitments and Robust Progress to Address Potent Greenhouse Gases, October 15, 2015. Available at: <https://www.whitehouse.gov/the-press-office/2015/10/15/fact-sheet-obama-administration-and-private-sector-leaders-announce>.

<sup>5</sup> California’s New Residential Zero Net Energy Action Plan. Available at: [http://www.cpuc.ca.gov/PUC/energy/Energy+Efficiency/eesp/res\\_zne\\_action+plan.htm](http://www.cpuc.ca.gov/PUC/energy/Energy+Efficiency/eesp/res_zne_action+plan.htm).

<sup>6</sup> Clean Energy and Pollution Reduction Action of 2015 (SB-350).

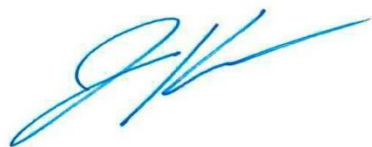
<sup>7</sup> The payback period is based on a product manufactured with an HFC physical blowing agent installed in a typical residential home in three U.S. cities. A copy of the life-cycle analysis is available at: <http://www.sprayfoam.org/files/docs/SPFA%20LCA%20Long%20Summary%20New.pdf>.

Furthermore, it is our understanding that U.S. EPA is considering additional measures to limit the use of high-GWP blowing agents in SPF end uses. EPA did not issue a final determination on SPF end uses in Rule 20 citing a need to conduct “a more extensive comparative risk analysis of the substitutes available before taking final action.”<sup>8</sup> The SPF industry provided technical information to EPA’s Significant New Alternatives Policy (SNAP) Program Office during the notice and comment process for Rule 20. Our comments to EPA detailed the process for commercializing new formulations using low-GWP alternatives – a process that can be iterative, time consuming, and likely vary between manufacturer and product type.<sup>9</sup> We plan to continue to engage SNAP staff and respond to requests for information as EPA considers additional action to reduce emissions of high-GWP blowing agents.

We commend the publication of the Draft Strategy for public comment and agree with CARB that any measures to restrict the use of high-GWP blowing agents for SPF products will be more effective and efficient at the Federal level.

If additional information regarding SPF products would assist in finalizing the SLCP strategy, please contact me at [justin\\_koscher@americanchemistry.com](mailto:justin_koscher@americanchemistry.com), (202) 249-6617.

Kind regards,



Justin Koscher, Director  
Center for the Polyurethanes Industry  
Spray Foam Coalition

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<sup>8</sup> 40 CFR Part 82, Change of Listing Status for Certain Substitutes Under the Significant New Alternative Policy Program (Final Rule 20).

<sup>9</sup> The industry’s public comments are available on the electronic docket (EPA-HQ-OAR-2014-0198) at: <http://www.regulations.gov/#!documentDetail;D=EPA-HQ-OAR-2014-0198-0175>.