



Center for the
Polyurethanes Industry

November 23, 2020

Submitted Electronically to: HFCReduction@arb.ca.gov

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95841

RE: Proposed Regulation Order: Prohibitions on Use of Certain Hydrofluorocarbons in Stationary Refrigeration, Stationary Air-conditioning, Other End-Uses (October 20, 2020)

Dear Board Members,

The American Chemistry Council's Center for the Polyurethanes Industry¹ (CPI) appreciates the opportunity to provide comment on the California Air Resources Board's (CARB) Proposed Regulation: *Prohibitions on Use of Certain Hydrofluorocarbons in Stationary Refrigeration, Stationary Air-conditioning, Other End-Uses* (Proposed Regulations) published for public comment on October 20, 2020.

CPI appreciates CARB's amendments to the definition of "Rigid polyurethane laminated boardstock and polyisocyanurate laminated boardstock" and the recordkeeping exemption for Table 1 end uses, via one-time reporting, for these products as outlined in § 95375(a)(4)(B).

Prior the passage of SB1013, CARB regulated HFC foam blowing agents in "Rigid polyurethane laminated boardstock and polyisocyanurate laminated boardstock," "flexible foam," and "integral skin foam." When CARB promulgated the original regulations, CARB implemented recordkeeping requirements for these end use sectors. These products are included in Table 1. After the passage of SB1013, CARB updated its regulations to insert the additional polyurethane end use sectors. All of the remaining polyurethane end use sectors are included in Table 2. However, CARB did not apply recordkeeping requirements for the products in Table 2.

Recordkeeping requirements put additional burden on manufacturers that comply with the HFC regulations without a meaningful benefit to CARB. The foam sector is different than the refrigerant sector. There is not on-going maintenance of foam products. The entire foam industry must be compliant with the new restrictions the date the restriction becomes effective. The restrictions on products in Table 1 became effective on January 1, 2020. Therefore, on-going recordkeeping requirements will not provide CARB novel information that cannot be accomplished with a one-time reporting solution.

¹ The Center for the Polyurethanes Industry's (CPI) mission is to promote the growth of the North American polyurethanes industry through effective advocacy, delivery of compelling benefits messages demonstrating how polyurethanes deliver sustainable outcomes, and creation of robust safety education and product stewardship programs.



CPI supports allowing foam manufacturers to provide a one-time attestation to CARB certifying they are not using restricted substances.

Thank you for considering our comments. If you have any questions or need additional information, please contact me at Stephen_wieroniey@americanchemistry.com, or (202) 249-6617.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen Wieroniey", with a long horizontal flourish extending to the right.

Stephen Wieroniey
Director