



Center for the
Polyurethanes Industry

July 2, 2018

Submitted Electronically to: <https://www.arb.ca.gov/lispub/comm/bclist.php>

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

RE: Prohibitions on Use of Certain Hydrofluorocarbons in Stationary Refrigeration and Foam End-Uses

Dear Board Members,

The American Chemistry Council's Center for the Polyurethanes Industry¹ (CPI) appreciates the opportunity to comment on the California Air Resources Board's (CARB) Proposed Regulation: Prohibitions on Use of Certain Hydrofluorocarbons (HFC) in Stationary Refrigeration and Foam End-Uses (Proposed Regulations). CPI represents the polyurethane industry value chain, including raw material suppliers. CPI appreciates CARB's willingness to engage with industry stakeholders during the development of the Proposed Regulations.

CPI is supportive of the removal of the invoice disclosure requirements included in the June 15, 2018 draft of the Proposed Regulations. This action eliminates an overly burdensome provision that would not have provided a meaningful path to enforcement.

CPI believes the recordkeeping requirements² should also be eliminated to limit the burden on regulated entities. CPI supports CARB's efforts to clarify the recordkeeping requirements apply only to product manufacturers, not distributors. However, CPI finds the recordkeeping requirements to be overly burdensome for sectors of the foam industry that have already transitioned away from HFC blowing agents included in Table 1 of Section 95374(a). In the summary of changes included in the 15 Day Notice, CARB acknowledges sectors that have already transitioned to low GWP blowing agents have a low potential to return to HFC technology.³ Requiring foam manufacturers to maintain records that confirm they are not using prohibited substances provides CARB with information the agency has already acknowledged. Accordingly, CPI requests CARB amend the proposed regulations to remove the recordkeeping requirements.

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 that reads "Stephen Wieroniey".

Stephen Wieroniey, Director

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.

² Proposed Regulation: Prohibitions on Use of Certain Hydrofluorocarbons in Stationary Refrigeration and Foam End-Uses - 15-Day language. Section 95375(d)(1)

³ Notice of Public Availability of Modified Text Prohibitions on Use of Certain Hydrofluorocarbons in Stationary Refrigeration and Foam End-Uses. Page 5.

