

Heat Transfer Products Group, LLC

**201 Thomas French Drive**

**Scottsboro, AL 35769-7405**

**Phone: 256-259-7400 Fax: 256-259-7474**

Date: July 2, 2018

To: Clerk of the Board

 California Air Resources Board

 1001 I Street

 Sacramento, CA 95814

Subject: Proposed Regulation: Prohibitions on Use of Certain Hydrofluorocarbons in Stationary Refrigeration and Foam End-Uses

HTPG supports the state of California’s efforts to reduce the use of lower global warming refrigerants in the end uses outlined in Table 1 of the modified text and would like to recommend the following changes to further clarify who is subject to the recordkeeping process (Section 95375(c)(2)). In the proposed disclosure statement *“This equipment is prohibited from use in California with any refrigerants on the “List of Prohibited Substances” for that specific end-use, in accordance with California Code of Regulations, title 17, section 95374. This disclosure statement has been reviewed and approved by [THE COMPANY] and [THE COMPANY] attests, under penalty of perjury, that these statements are true and accurate”.*  We recommend deleting the highlighted portion of the statement. In the original regulation language this clause would have been applicable due to the “designed for use” declaration, however, the revised language is a “prohibited from use” which would not necessitate a verification of accuracy. To ensure manufacturers of “motor-bearing” new refrigeration equipment comply with the California specific *disclosure statement* HTPG recommends that, in lieu of a written disclosure statement, adding a *visible label* affixed adjacent to the nameplate (dataplate) whereby the purchaser is made aware of the importance of selecting a substance not listed by the state of California in Table 1 (for a specific end use). This visible label would declare the same information as in the proposed disclosure statement. By using this recommendation both the manufacturer and the purchaser have the necessary information prohibiting the use of any chemical substance being proposed for exclusion in California.

HTPG appreciates this opportunity to provide these comments and if you have any questions, please do not hesitate to contact me.

Sincerely,

Ed Wuesthoff,

HTPG Compliance Engineering Project Manager