

July 28, 2020

Submitted via: <http://aq.ecology.commentinput.com/?id=g7B9h>

Washington Department of Ecology
Air Quality Program
Attn: Linda Kildahl
P.O. Box 47600
Olympia, WA 98504

RE: Proposed Rule – Chapter 173-443 WAC Hydrofluorocarbons (June 16, 2020)

Dear Ms. Linda Kildahl,

The Polyisocyanurate Insulation Manufacturers Association (PIMA) appreciates the opportunity to comment on the Department of Ecology's (Department) proposed rule for regulating the use of hydrofluorocarbons (HFCs). The comments below focus on the proposed rule's requirements for the foams end-use category.

1. PIMA supports the modifications made to Section 020 "Applicability" with respect to the proposed labeling requirements.

In earlier comments to the Department, PIMA expressed concerns related to the applicability of the labeling requirements for specific end-uses where the use of the prohibited HFC substitutes was discontinued many years ago or, in the case of polyisocyanurate insulation boardstock, were never used. With the addition of the language for subsection (2) under Applicability, we now believe the Department has appropriately scoped the labeling requirements to apply to only those end-uses where the disclosures will be most helpful to enforcement efforts and informative to consumers. We encourage the Department to maintain the proposed language for subsection (2) in the permanent rule.

2. PIMA supports the level playing field created by the proposed use restrictions and prohibition dates in Section 040 "List of prohibited substitutes" for the foams end-use category.

Importantly, the Department's proposed rule establishes a uniform playing field for products within the foams end-use category as it relates to the use restrictions for high-global warming potential (GWP) HFC substitutes and blends thereof. This level playing is especially important for the building foam insulation product sector in which many products are in direct competition with one another. This sector includes products such as polyisocyanurate insulation boardstock, spray polyurethane foam insulation, and expanded and extruded polystyrene insulation boardstock. Low-GWP substitutes are commercially available and viable for all

products in the building foam insulation sector, and the proposed rule creates a uniform transition to more sustainable solutions for this sector. If finalized as drafted, the Department's HFC rule will ensure no manufacturer or foam insulation product type receives a competitive advantage due to unequal use restrictions for HFCs and blends thereof.

Therefore, we strongly urge the Department to maintain the proposed use restrictions and prohibition dates for the foams end-use category in the permanent rule, and reject any modifications that would permit the continued use of high-GWP substitutes and blends thereof for specific foam end-uses (with the exception of the military, space, and aeronautics exemptions included in Section 050).

3. About PIMA

PIMA represents North American manufacturers of laminated polyisocyanurate insulation boardstock products. The manufacturing members of the Association include Atlas Roofing Corporation, Carlisle Construction Materials, Firestone Building Products, GAF, Johns Manville, IKO Industries, Rmax, and Soprema. These manufacturers account for the majority of polyiso insulation produced and sold in North America, including Washington.

4. Questions

Please contact me at jkoscher@pima.org or (703) 224-2289 with questions or if additional information is required.

Sincerely,



Justin Koscher
President