

Whirlpool Corporation

This request came in after the close of public comment period, but we chose to address it in the CES.

Request: Modification of deadlines and/or temporary enforcement discretion of six months for compact, full-size and built-in refrigerators.

How has COVID-19 impacted Whirlpool Corporation?

Transition to R600a refrigerants is a highly complex process. R600a is a high-purity isobutane, which is highly flammable. Safe implementation of R600a requires significant facility changes:

- External storage tank facilities with traffic barriers, fencing and computerized safety systems that exceed industry standards (four major manufacturing facilities).
- Dedicated charge zones
- New charge cells with two-stage ventilation (multiple cells per factory)
- Alarms with automatic shutdown procedures
- Redundant computerized monitoring systems
- Changes to product labeling
- New testing capabilities

COVID-19 factory safety [precautions](#) have resulted in slowing down production lines to achieve sufficient employee distancing and have required the reallocation of engineering and people resources.

Whirlpool COVID-19-related temporary shutdowns of refrigeration plants in Iowa, Ohio and Mexico have prevented project execution such as product builds.

[Increased demand](#) for refrigerators and freezers and supply constraints have impacted inventory levels and continues to affect product availability. Rebalancing inventories could take until the end of the year.

Installation of R600a assembly cells must be done when lines are not operating (requires down days or weekend work).

Travel bans (e.g. [Schengen travel suspension](#)) have impacted the ability of Whirlpool suppliers to install necessary equipment in our factories and conduct safety audits.

Equipment shipment delays cascading into installation delays, having ripple effects to product builds, testing and launch activities.

Materials, parts and sub-assemblies supply chain delays affecting product builds, testing and launch activities.

Whirlpool personnel travel restrictions affecting several aspects of the R600a program execution

Lab shutdowns/constraints affecting product testing and certifications.