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Regulatory Technical Brief:
Federal and State Global Warming Regulations for HFC 134a

History:

The aerosol industry moved to the use of HFC-134a propellant as a non-flammable alternative to Freon 22, which was being phased out due to ozone depleting potential. Since then, HFC-134a has been used for many applications that call for a non-flammable propellant, such as air dusters, electronic and electrical cleaners and non-flammable adhesives.

In 2016, the U.S. EPA published the **Significant New Alternatives Policy (SNAP)** rules that would have severely limited the use of HFC-134a to only uses it considered essential. The Federal SNAP rules were halted due to legal challenges and never became law. Since that time, several States have enacted their own rules that are similar to the EPA SNAP rule. California was the first to do so and other states have also followed suit.

Why are restrictions being imposed?

The short answer is that the Global Warming Potential (GWP) of HFC-134a is significant and there are replacement gases available that have less environmental impact. The EU has banned most uses of HFC-134a.

What is our purpose in providing this information?

This Technical Brief is intended to make sure that our Customers are aware of the rules restricting the use of HFC-134a so that measures can be taken to restrict sales where necessary.

Even for products that are allowed under the exempted uses, compliance actions in some states may be required. For example, some of the states require that 134a be listed on the product Safety Data Sheet (SDS) in Section 3. The State of Washington requires that 134a be included on the product label as well as the SDS.

The states of Colorado, Delaware, Maryland and Massachusetts require an explanation of the date coding system be submitted.

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As other states adopt these rules, it will be necessary to stay informed of the requirements. Table 1 below is the current list of States and effective dates. Table 2 lists the exempted uses that are allowed for HFC-134a.

Table 1: States with 134a Restrictions

State	Status	Aerosol Propellant Effective Date	Disclosure Requirement	Record Keeping Requirement
California	Effective	Jan 1, 2019	No	No
Colorado	Effective	Jan 1, 2021	Yes	Yes
Connecticut	Drafting Regulatory Language	TBD	TBD	TBD
Delaware	Effective	Sept 1, 2021	Yes	No
Maine	Proposed Legislation	Jan 1, 2022	Yes	Yes
Maryland	Effective	Jan 1, 2021	Yes	Yes
Massachusetts	Effective	Jan 1, 2021	Yes	Yes
New Jersey	Law Signed Waiting for Regulatory Process to Start	July 1, 2020	Yes	TBD
New York	Effective	Jan 1, 2021	No	No
Oregon	Proposed Legislation	Jan 1, 2022	TBD	TBD
Pennsylvania	Drafting Regulatory Language	TBD	TBD	TBD
Rhode Island	Draft Regulation Available	June 1, 2021	No	Yes
Texas	Proposed Legislation	Jan 1, 2023	TBD	TBD
Vermont	Effective	Jan 1, 2021	No	No
Virginia	Law Signed Drafting Regulatory Language	TBD	TBD	TBD
Washington	Effective	Jan 1, 2020	Yes	No

Table compiled by 3/1/2021 Household and commercial Products Association.

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Table 2: Exempted Uses of 134a

HFC-134a	• Cleaning products for removal of grease, flux and other soils from electrical equipment or electronics; • Refrigerant flushes; • Products for sensitivity testing of smoke detectors; • Lubricants and freeze sprays for electrical equipment or electronics; • Sprays for aircraft maintenance; • Sprays containing corrosion preventive compounds used in the maintenance of aircraft, electrical equipment or electronics, or military equipment; • Pesticides for use near electrical wires, in aircraft, in total release insecticide foggers, or in certified organic use pesticides for which EPA has specifically disallowed all other lower-GWP propellants; • Mold release agents and mold cleaners; • Lubricants and cleaners for spinnerettes for synthetic fabrics; • Duster sprays specifically for removal of dust from photographic negatives, semiconductor chips, specimens under electron microscopes, and energized electrical equipment; • Adhesives and sealants in large canisters; • Document preservation sprays; • FDA-approved MDIs for medical purposes; • Wound care sprays; • Topical coolant sprays for pain relief; and • Products for removing bandage adhesives from skin.

Where can more information about these regulations be found?

For the text of the rules, proposed rules or status of rulemaking it is necessary to go to each State's website. The rules and documentation are generally located in the Air Quality Divisions tab/website.

PLZ Aeroscience greatly values your business! We work hard to provide regulatory support to our Customers so that your products are in compliance with all applicable laws and regulations. Please contact your Sales or Customer Service Representative with any questions about the restrictions that may apply to our products.