

Submitted Electronically

November 30, 2020

Clerk's Office
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Public Comments on Notice of Hearing to Consider Proposed Amendments to the Prohibitions on Use of Certain Hydrofluorocarbons in Stationary Refrigeration, Chillers, Aerosols-Propellants, and Foam End-Uses Regulation ("California HFC Regulation")

Dear Board Members:

The Polyisocyanurate Insulation Manufacturers Association ("PIMA") respectfully submits this public comment letter regarding the above-referenced public hearing and proposed amendments to the California HFC Regulation. PIMA represents North American manufacturers of laminated polyisocyanurate insulation board products ("polyiso insulation"). Our members 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 installed in North America, including California.

Recordkeeping for Table 1 Foam End-Uses: PIMA supports the addition of an alternative compliance pathway (Section 95375(a)(4)(B)) for the recordkeeping requirement applicable to Table 1 foam end-uses. The proposed amendment to add subsection (B)'s option for a one-time attestation reduces the compliance burden for manufacturers that never used or no longer use any prohibited substance. We encourage CARB to approve this amendment.

Section 95377 Variance: PIMA understands the rationale for proposing to add Section 95377 Variance to the California HFC Regulation. The public notice requirements included in subsection (d) are critical to ensuring that any final decision on a requested variance is based on a full and complete record. This is especially important in competitive end-use categories like foam insulation used to insulate buildings and homes. A decision to allow one manufacturer continued use of HFCs can create a significant competitive advantage over products that are in direct competition with manufacturer's products. We encourage CARB to maintain robust public notice requirements if the Board approves the proposed variance section.

We appreciate the opportunity to comment on the proposed amendments to the California HFC Regulation. Please contact me should additional information be helpful to the regulatory process.

Respectfully submitted,

A handwritten signature in blue ink, appearing to be 'JK', is positioned below the text 'Respectfully submitted,'.

Justin Koscher
President