

**DRAFT Concepts on Labeling of Products and Equipment**  
**Chapter 173-443 WAC, Hydrofluorocarbons**

The focus of this document is on the logistics of labeling. The rule language will have precise wording. Note that we would like the flexibility to accommodate any potential industry- or nation-wide symbol system that may emerge. References to symbols below are placeholders for such a development. The definition language below is draft and deliberative for the purposes of facilitating discussion.

“Product” means an article manufactured or refined for sale that contains or uses a substitute.

“Equipment” means a collection of components assembled or manufactured to function together that contains at least one product.

“Unit” means a collection of like products bundled or packaged together for purposes of commerce.

“Label” means a badge, decal, printed matter, or display adhered or attached to a product, or that has the potential to be adhered or attached to a product, for the purposes of conveying information to the end user of that product on the inclusion or use of the substitutes associated with that product.

“Symbol” means a graphical or hybrid word-graphic symbol approved by Ecology for the purposes of conveying the types of substitutes used in the product or equipment and signaling that further information on the use of substitutes is available through online disclosure.

Labeling Concept Summaries

<b>Air Conditioning and Refrigeration</b>		
	Refrigerant(s)	Foam Installed or Blown in Product at Manufacturer
Built-in residential consumer refrigeration products	Applicable substitute listed on safety label (UL or equivalent) on product.	Substitute disclosed: 1) On UL Label, or, 2) On dedicated label, or, 3) In owner’s manual.
Compact residential consumer refrigeration products		
Residential consumer refrigeration products other than compact and built-in residential consumer refrigeration products		
Vending machines		
Stand-alone units	1) Applicable substitute(s) listed on safety label (UL or equivalent) on refrigeration equipment, or, 2) On dedicated label.	Substitute disclosed: 4) On dedicated label, or, 5) In owner’s manual, or, 6) Through an on-equipment symbol (approved by Ecology) plus online substitute disclosure.
Centrifugal chillers		
Positive displacement chillers		
Refrigerated food processing and dispensing equipment		
Remote condensing units		
Supermarket systems		
Cold storage warehouses		

Aerosol Propellants	
Consumer products	<ol style="list-style-type: none"> <li>1) Substitute listed on product label, or,</li> <li>2) Substitute listed on box or packaging label, or,</li> <li>3) An on-product symbol plus online substitute disclosure, or,</li> <li>4) An on-box or on-packaging symbol plus online substitute disclosure.</li> </ol>
Other products (with demonstrable regulatory label format limitations)	<ol style="list-style-type: none"> <li>1) Any of the options above (1-4), or,</li> <li>2) A product insert (SDS or paper disclosure) and online disclosure.</li> </ol>

Foams		
	Labeling and Disclosure Requirement(s)	Foam Application Description
Rigid polyurethane: Appliances	Unit label	Insulation foam in domestic refrigerators and freezers
Rigid polyurethane: Commercial Refrigeration	In addition, see refrigeration requirements related to disclosure of foam to end users of refrigeration products.	insulation for pipes, walls and metal doors in commercial refrigeration equipment, vending machines, coolers, buoyancy, and refrigerated transport vehicles
Flexible polyurethane	<p>For manufacturer end-use products: Substitute disclosed on unit label and/or any of the consumer product options below.</p> <p>For consumer end-user products:</p> <ol style="list-style-type: none"> <li>1) Substitute listed on product label, or,</li> <li>2) Substitute listed on box or packaging label, or,</li> <li>3) An on-product symbol plus online substitute disclosure, or,</li> <li>4) An on-box or on-packaging symbol plus online substitute disclosure.</li> </ol>	foam furniture, bedding, chair cushions, and shoe soles
Rigid polyurethane: Marine Floatation		used in boat manufacturing for both structural and floatation purposes
Polystyrene extruded sheet	Substitute disclosed on unit label, or, In lieu of or in addition to unit labels, either:	foam for packaging and buoyancy or floatation
Integral skin polyurethane	<ol style="list-style-type: none"> <li>1) Substitute listed on product label, or,</li> <li>2) Substitute listed on packaging label, or,</li> <li>3) An on-product symbol plus online substitute disclosure, or,</li> <li>4) On-packaging symbol plus online substitute disclosure.</li> </ol>	car steering wheels, dashboards, and shoe soles
Polyolefin		foam sheets and tubes
Polystyrene extruded boardstock and billet		insulation for roofing, walls, flooring, and pipes
Rigid polyurethane: Sandwich Panels		insulation for walls and metal doors
Phenolic insulation board		
Bunstock		
Rigid polyurethane: Spray	Substitute disclosed on <ol style="list-style-type: none"> <li>1) A label on the canister or cylinders, or,</li> <li>2) On a box or packaging label, or,</li> <li>3) On an on-box or on-packaging symbol plus online substitute disclosure.</li> </ol>	insulation for roofing and walls