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.

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**Labeling Concept Summaries**

<table>
<thead>
<tr>
<th>Air Conditioning and Refrigeration</th>
<th>Refrigerant(s)</th>
<th>Foam Installed or Blown in Product at Manufacturer</th>
</tr>
</thead>
</table>
| **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** |  |  |
| **Centrifugal chillers** |  |  |
| **Positive displacement chillers** |  |  |
| **Refrigerated food processing and dispensing equipment** | 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. |
| **Remote condensing units** |  |  |
| **Supermarket systems** |  |  |
| **Cold storage warehouses** |  |  |
## Aerosol Propellants

### Consumer products

1. Substitute listed on product label, or,
2. Substitute listed on box or packaging label, or,
3. An on-product symbol plus online substitute disclosure, or,
4. An on-box or on-packaging symbol plus online substitute disclosure.

### Other products (with demonstrable regulatory label format limitations)

1. Any of the options above (1-4), or,
2. A product insert (SDS or paper disclosure) and online disclosure.

## Foams

<table>
<thead>
<tr>
<th>Rigid polyurethane: Appliances</th>
<th>Labeling and Disclosure Requirement(s)</th>
<th>Foam Application Description</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Unit label</td>
<td>Insulation foam in domestic refrigerators and freezers</td>
</tr>
<tr>
<td></td>
<td>In addition, see refrigeration requirements related to disclosure of foam to end users of refrigeration products.</td>
<td></td>
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</tbody>
</table>

### Flexible polyurethane

For manufacturer end-use products: Substitute disclosed on unit label and/or any of the consumer product options below.

For consumer end-user products:
1. Substitute listed on product label, or,
2. Substitute listed on box or packaging label, or,
3. An on-product symbol plus online substitute disclosure, or,
4. An on-box or on-packaging symbol plus online substitute disclosure.

### Rigid polyurethane: Marine Floatation

Substitute disclosed on unit label, or, In lieu of or in addition to unit labels, either:

1. Substitute listed on product label, or,
2. Substitute listed on packaging label, or,
3. An on-product symbol plus online substitute disclosure, or,
4. On-packaging symbol plus online substitute disclosure.

### Polystyrene extruded sheet

Substitute disclosed on unit label, or, In lieu of or in addition to unit labels, either:

1. Substitute listed on product label, or,
2. Substitute listed on packaging label, or,
3. An on-product symbol plus online substitute disclosure, or,
4. On-packaging symbol plus online substitute disclosure.

### Integral skin polyurethane

Substitute disclosed on unit label, or, In lieu of or in addition to unit labels, either:

1. Substitute listed on product label, or,
2. Substitute listed on packaging label, or,
3. An on-product symbol plus online substitute disclosure, or,
4. On-packaging symbol plus online substitute disclosure.

### Polyolefin

Substitute disclosed on unit label, or, In lieu of or in addition to unit labels, either:

1. Substitute listed on product label, or,
2. Substitute listed on packaging label, or,
3. An on-product symbol plus online substitute disclosure, or,
4. On-packaging symbol plus online substitute disclosure.

### Polystyrene extruded boardstock and billet

Substitute disclosed on unit label, or, In lieu of or in addition to unit labels, either:

1. Substitute listed on product label, or,
2. Substitute listed on packaging label, or,
3. An on-product symbol plus online substitute disclosure, or,
4. On-packaging symbol plus online substitute disclosure.

### Rigid polyurethane: Sandwich Panels

Substitute disclosed on unit label, or, In lieu of or in addition to unit labels, either:

1. Substitute listed on product label, or,
2. Substitute listed on packaging label, or,
3. An on-product symbol plus online substitute disclosure, or,
4. On-packaging symbol plus online substitute disclosure.

### Phenolic insulation board

Substitute disclosed on unit label, or, In lieu of or in addition to unit labels, either:

1. Substitute listed on product label, or,
2. Substitute listed on packaging label, or,
3. An on-product symbol plus online substitute disclosure, or,
4. On-packaging symbol plus online substitute disclosure.

### Bunstock

Substitute disclosed on unit label, or, In lieu of or in addition to unit labels, either:

1. Substitute listed on product label, or,
2. Substitute listed on packaging label, or,
3. An on-product symbol plus online substitute disclosure, or,
4. On-packaging symbol plus online substitute disclosure.

### Rigid polyurethane: Spray

Substitute disclosed on unit label, or, In lieu of or in addition to unit labels, either:

1. A label on the canister or cylinders, or,
2. On a box or packaging label, or,
3. On an on-box or on-packaging symbol plus online substitute disclosure.