

May 8, 2020

Lisa Vest, Hearing Officer  
Delaware Department of Natural Resources and Environmental Control  
89 Kings Highway  
Dover, DE, 19901

*Via online submission at <https://dnrec.alpha.delaware.gov/public-hearings/comment-form/>*

**RE: 1151 Requirements for the Phase-Out of Hydrofluorocarbons – Version 4**

Ms. Vest,

Thank you for the opportunity to provide comments on Delaware's draft regulation to prohibit certain uses of hydrofluorocarbons (HFCs) in specific end-uses. Honeywell strongly supports this draft regulation and applauds Delaware's action. With this action, Delaware will join California, Connecticut, Hawaii, Massachusetts, New Jersey, New York, Rhode Island, Vermont, Washington state and other states that have or will soon adopt consistent requirements to maintain the transition to safer, available alternatives to high-global-warming-potential (GWP) HFCs.

HFCs are used throughout the world as refrigerants in air conditioning to cool cars, homes and buildings, in home and commercial refrigeration, in foam insulation, and as aerosol propellants and solvents. While efficient, many HFC products have high global-warming-potential. Because HFCs are used in everyday life, replacing these products with next-generation alternatives can make a positive impact on the environment and human health.

Replacing HFCs with better alternatives is key to achieving greenhouse gas emissions reductions in Delaware. Globally, replacing HFCs with low-global-warming-potential alternatives could avoid up to 0.5 degrees Celsius of warming by the end of the century.

American industry has invested well over \$1 billion domestically and employed more than 700,000 US workers to research, develop and implement alternative solutions to high-GWP HFCs. This includes newly constructed manufacturing hubs in the United States to produce such alternatives. This bill will help drive a transition to the low-GWP solutions and promote US leadership in innovation and manufacturing.

Because of this investment, cost-effective, near drop-in alternatives to HFCs are commercially available today and are ready for widespread adoption. In addition to lower GWP, technologies using environmentally preferable HFC alternatives are often also more energy efficient than traditional systems, and thus lower customer costs and increase competitiveness. Honeywell continues to work with our customers to ensure a smooth transition to these advanced technologies.

In 2015 and 2016, under the Significant New Alternatives Policy (SNAP) program US EPA established practical and reasonable timelines to transition the industry from outdated HFCs to safer next-generation alternative solutions on a clear and predictable schedule. However, litigation has undermined the SNAP timeline, upending a consistent federal approach to the HFC phasedown.

So states must take a lead on this essential initiative and with this regulation, Delaware is seizing the opportunity to build upon consistent and growing state-level efforts. We support that effort.

We have just one request for a somewhat technical amendment to a particular definition for foam. Please see attached.

Thank you for the opportunity to express our support for this important proposed rule. We applaud Delaware's leadership on this issue and look forward to working with you to implement the rule.

Sincerely,

DocuSigned by:  
  
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Sanjeev Rastogi  
Vice President & General Manager  
Honeywell Fluorine Products

## Attachment

We understand that DNREC will consider addressing further edits to the definitions in a future process. We would propose an important clarification to the definition for polystyrene extruded boardstock:

**“Polystyrene Extruded Boardstock and Billet (XPS)”** means a foam formed from predominantly polystyrene pellets monomer and produced on extruding machines in the form of continuous foam slabs which can be cut and shaped into panels used for roofing, walls, ~~and~~ flooring, pipe and vessel insulation and other miscellaneous uses.

Styrene monomers are converted to polystyrene under very controlled conditions by plastic producers, not foam producers.

We also support the requested definitional changes from the American Chemistry Council’s Center for the Polyurethanes Industry.