



November 3, 2010

Subject: CARB Restriction on HFC-134a Duster in 2011

To Whom It May Concern:

AB 32, a regulation from CARB (*California Air Review Board*), will restrict the use of HFC-134a duster in California starting January 1, 2011 (*12:00am PST*).

CARB is targeting HFC-134a because of its global warming impact. The restriction is expected to drive much of the demand to HFC-152a based duster, which is already prevalent in consumer markets because of lower cost. The following is a comparison of the GWP (global warming potential):

- $CO_2 = 1$ (*baseline*)
- HFC-134a = 1300
 - HFC-152a = 140

HFC-152a (*Techspray part #1673-10S*) will be able to be sold without restriction. Use of HFC-134a dusters (*Techspray part #'s 1671-10S, 1671-15S, 1697-10S, 1697-8S*) will not be allowed in California except when used on energized circuits. CARB is allowing the exemption for dusting energized circuits because the commercially available, reasonably priced substitutes for HFC-134a are flammable. How this exemption will be monitored and enforced is unknown. It is also unknown if the exemption will be extended to other potentially hazardous industrial or repair applications, i.e. involving open flames or sparks.

The challenge will be establishing a process to control the selling of HFC-134a based dusters in California. Every manufacturer and reseller will have to make a decision based on their own markets and systems. Starting on or before 1/1/11, Techspray will be marking the front panel of Techspray branded HFC-134a duster "CARB Restricted: Energized Equipment use only". We recommend this language be included in catalog and on-line product listings.

Private label customers will have to direct us on any labeling or other product changes. We would be happy to consult with you on the stated requirements of the regulation, but interpretation will be left up to you.

This regulation only applies to the duster product category. Freeze sprays (*Techspray part #1672-10S, 1672-15S, 1747-10S*) are not affected.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin Pawlowski".

Kevin Pawlowski
Senior Product Manager
Techspray
Office - 800-858-4043 x531
Mobile - 806-206-3374
kpawlowski@techspray.com