



Specification Tip: Ensure Your Specified Spray Foam Insulation Complies with State Environmental Regulations

Over the past couple of years, twelve states have enacted legislation that prohibits the use of hydrofluorocarbon (HFC) blowing agents in spray polyurethane foam (SPF) insulation. As of Jan 1, 2022, the following states prohibit HFCs: California, Colorado, Delaware, Maine, Maryland, Massachusetts, New Jersey, New York, Rhode Island, Vermont, Virginia, and Washington.

HFC blowing agents have been the workhorse of the SPF industry for the past 20 years in closed-cell, medium-density spray foam insulation products. Despite having zero ozone depletion potential, HFCs contribute to an increase in Global Warming Potential (GWP). In response to this environmental risk, spray foam manufacturers formulated products based on hydrofluoroolefins (HFOs) – next-generation foam blowing agents with an ultra-low GWP. With the absence of a federal mandate and the availability of more environmentally responsible substitute products, individual states are now leading the transition away from products containing HFCs.

To prevent the installation of HFC-containing products in states with HFC restrictions, Carlisle Spray Foam Insulation recommends updating your product specifications with the following statements.

Global warming potential (GWP) is the heat absorbed by any greenhouse gas in the atmosphere, as a multiple of the heat that would be absorbed by the same mass of carbon dioxide (CO₂). Blowing agent technology has evolved over the last few decades, greatly reducing environmental impact. Fourth-generation blowing agents based on HFO technology have reduced the GWP to be equivalent with CO₂.

BLOWING AGENT	GWP
CFC-12 (Freon 12)	10,900
HCFC-141b	725
HFC-365mfc	794
HFC-245fa	1,030
HFOs	1
CO ₂	1

Under **SECTION 072119 - FOAMED-IN-PLACE INSULATION**

Under Paragraph for **INFORMATIONAL SUBMITTALS**

Under Sub-Paragraph for Test and Evaluation Reports

Add a line for “HFC compliance statement from manufacturer”

Under Paragraph for product **CLOSED-CELL SPRAY-APPLIED POLYURETHANE FOAM INSULATION**

Under Sub-Paragraph for Performance and Design Requirements:

Add lines for

Global Warming Potential: Less than or equal to two (2)

Ozone Depletion Potential: Zero (0)

For state-specific information, please refer to the following links.

California	https://govt.westlaw.com/calregs/Index
Colorado	https://www.sos.state.co.us/CCR/GenerateRulePdf.do?ruleVersionId=9860&fileName=5%20CCR%201001-26
New York	https://www.dec.ny.gov/regulations/119032.html
New Jersey	https://legiscan.com/NJ/text/A5583/id/2073116
Vermont	https://dec.vermont.gov/sites/dec/files/aqc/laws-regs/documents/Vermont_HFC_Rule_Adopted_CLEAN.pdf
Virginia	http://register.dls.virginia.gov/details.aspx?id=9644
Maine	https://legislature.maine.gov/statutes/38/title38sec1613-2.html
Rhode Island	https://rules.sos.ri.gov/regulations/part/250-120-05-53
Delaware	https://regulations.delaware.gov/register/march2021/final/24%20DE%20Reg%20876%2003-01-21.htm
Massachusetts	https://www.mass.gov/doc/310-cmr-776-prohibitions-on-use-of-certain-hydrofluorocarbons/download
Maryland	http://www.dsd.state.md.us/COMAR/SubtitleSearch.aspx?search=26.11.33.*
Washington	https://app.leg.wa.gov/RCW/dispo.aspx?cite=70.235.080

Please reach out to me if you have any questions.

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