

Technical Brief

Restrictions on Products Containing HCFC's

Under the Clean Air Act, the EPA prohibits the sale or distribution of certain products containing hydrochlorofluorocarbons (HCFC's), also called Class II substances. These prohibitions were put into place as part of the phase-out of Class II ozone-depleting substances. This ban went into effect on January 1, 1994

Specifically, the use of Class II substances is prohibited in aerosols. However, the regulation lists several categories of products that are exempted from the ban. Exemptions are based on specific types of products and uses. Products that are exempted from the ban include the following:

- lubricants, coatings or cleaning fluids for electrical or electronic equipment
- lubricants, coatings or cleaning fluids for aircraft maintenance
- mold release agents used in the production of plastic and elastomeric materials
- spinnerette lubricants / cleaning sprays used in the production of synthetic fibers

These are just some of the exemptions. The full list of exempted products can be found at 40 CFR Part 82.70(a)(2). Products falling into any of these categories are allowed to contain HCFC's and are legal for sale and use.

Aerosol cleaning fluids for electronic and photographic equipment containing Class II substances: This particular type of product, while allowed to contain HCFC's, carries some additional restrictions. Sellers & distributors of these products must adhere to the following requirements:

- These products can only be sold to commercial purchasers. The seller or distributor must verify that the purchaser is a commercial entity. The purchaser may present any of the following forms of verification: Federal employer ID number, State tax exemption number, local business license number or government contract number.
- Sellers and distributors must prominently display a sign where sales of such product occur in order to alert purchasers of the sales and use restrictions. The exact language for the sign can be found at 40 CFR Part 82.68(d).

A few CRC products contain HCFC-225 which is a Class II substance. These products are legal to sell and use as long as the sales and use restrictions are followed. CRC products containing Class II substances include the following:

CRC Product	CRC Part #	Special Restrictions
HV Switchgear Lubricant	02060	None
Precision Plus® Cleaner	02210 & 02211	Commercial purchasers / Post sign
Aviation Precision Plus® Cleaner	10310	Commercial purchasers / Post sign

For more information, contact CRC Technical Services at 800-521-3168.