

FAQs on AK-225: What are the rules starting January 1, 2015?

AK-225 refers to HCFC-225ca, HCFC-225cb and blends thereof

In October, 2014, EPA finalized a narrow exemption to allow owners of existing inventory of virgin HCFC-225ca, HCFC-225cb, or mixtures thereof to continue using their inventory as a solvent after the January 1, 2015 prohibition on use and introduction into interstate commerce takes effect. The exemption would allow anyone who owns HCFC-225ca/cb solvent to continue using existing inventory for solvent needs only.

1. **Can I sell bulk AK-225 on or after January 1, 2015?** No. EPA's stratospheric ozone regulations at 40 CFR 82.15 prohibit introduction into interstate commerce of virgin HCFCs for solvent uses, beginning January 1, 2015.
2. **Can I use bulk AK-225 as a solvent on or after January 1, 2015 (e.g. in a vapor degreaser)?** Yes, in some circumstances. The October 2014 Final HCFC Allocation Rule established a narrow exemption to the prohibition on the use of virgin HCFCs as solvents. To read about that exemption, please see the October 2014 Final HCFC Allocation Rule available at [regulations.gov](http://www.regulations.gov) (see section IV.B).

You may only use bulk AK-225 that you own, since the sale of virgin HCFCs is prohibited (see previous question). You may only use bulk AK-225 as a solvent directly. That is, you may not package it for distribution or put it into a salable product because you would not be using the AK-225 as a solvent.

3. **I package AK-225 in aerosol form for sale to distributors or end-users. May I continue to manufacture AK-225 aerosols in 2015?** No, this would be a manufacturing use of AK-225, which is prohibited starting January 1, 2015. EPA's narrow exemption to the use prohibition applies only to solvent uses of bulk AK-225.
4. **I package AK-225 in aerosol form, but plan to cease production prior to 2015. Will these aerosol products require a label?** It depends whether they have already been introduced into interstate commerce. EPA's labeling regulations at 40 CFR 82.102 require that products containing HCFCs be labeled prior to their introduction into interstate commerce starting January 1, 2015. However, you must cease manufacture of AK-225 aerosols or other products containing AK-225 prior to 2015 (see previous questions). Those products manufactured and entered into interstate commerce *prior* to 2015 will not be subject to the labeling requirements. For products manufactured in the U.S., introduction into interstate commerce occurs when:
 - The product is released from the facility in which it was manufactured, or
 - The product enters the warehouse from which a domestic manufacturer releases the product for sale or distribution

So long as one of these events has occurred prior to 2015, the product does not need a label.

5. **I use AK-225 as a solvent. Can I buy bulk AK-225 on or after January 1, 2015?** No. See question 1.
6. **I use AK-225 as a solvent. Can I buy aerosolized AK-225 products on or after January 1, 2015?** Yes, so long as the manufacture date of the aerosol is before January 1, 2015. AK-225 in aerosol form is considered a product under EPA regulations, and is not affected by the 40 CFR 82.15 use and sales prohibition on bulk, virgin HCFCs.
7. **I use AK-225 as a solvent in metals, electronics or other precision cleaning. I sell the piece/part that I clean with AK-225 (e.g. I sell a computer chip to a satellite manufacturer). Does my piece/part require a label, per the Clean Air Act labeling requirements?** Yes. EPA's labeling regulations at 40 CFR 82.102 require that products manufactured with a process that uses an HCFC be labeled prior to their introduction into interstate commerce starting January 1, 2015. You are manufacturing a product with AK-225; therefore, the product will require a label prior to introduction into interstate commerce starting January 1, 2015. See: [EPA's labeling webpage](http://www.epa.gov/labeling) for guidance on the labeling requirements.