



August 6, 2019

Chair Mary Nichols
 California Air Resources Board
 1001 I Street
 PO Box 2815
 Sacramento CA 95812

Dear Chair Nichols,

The signatories to this letter support pragmatic, predictable, and cost-effective measures that allow the California Air Resources Board (CARB) to meet the state’s hydrofluorocarbon (HFC) emissions reductions target as defined in California Senate Bill 1383 – a 40 percent reduction in 2030 from 2013 levels. The following measures provide industry with certainty and sufficient time to comply with the new obligations.

We support policies to limit use of HFCs in commercial refrigeration technologies provided they include the following. California should:

- Adopt appropriate safety standards into California Building Code to enable low GWP solutions prior to transition dates.
- Adopt additional regulations prohibiting refrigerants with a global warming potential (GWP) and dates as noted in the table below.

Note: Commercial Refrigeration equipment with charge less than 50 lbs is covered by CaSNAP’s adoption of EPA SNAP rules 20 and 21 and therefore not addressed in the table below.

Equipment Type	Charge [lbs]	Original Proposal		Updated Proposal - Two Step Approach			
				Step 1		Step 2	
		GWP Limit	Transition Year	GWP Limit	Transition Year	GWP limit	Transition Year
Large CR – New	>300	150	2021	150	2021	150	2021
Medium CR – New	>50, <=300	1500	2021	1500	2021	150	2024 ^[2]
Secondary Systems	<=300	1500	2021	1500	2021	150	2024 ^[2]
Cascade CO2 Systems	<=300	1500	2021	1500	2021	150	2024 ^[2]
Cold Storage Warehouses	>=300	1500	2021	150	2021	150	2021
Cold Storage Warehouses	<300	150	2021	1500	2021	300	2024 ^[2]
Ice Machines ^[1]	>50	2200	2022	2200	2022	300	2024 ^[2]

[1] Flammable refrigerants cannot be used per ASHRAE 15 in hallways and egress areas, where ice machines are often located.

[2] Date is contingent on the adoption of Safety Standards into California State Code.

- Implement this prohibition based on the date of manufacture.
- Allow the distribution of products from California to other states in which they are legal for sale in cases in which California's regulations differ from those of other states.

In addition to supporting the policies above, we also:

- Support robust enforcement and strong disincentives for non-compliance for HFC measures.
- Commit to work to complete relevant safety standards and strongly support their adoption into building codes as quickly as possible.
- Support CARB working with the California Energy Commission (CEC) to encourage proper installation, commissioning, maintenance, and servicing of commercial refrigeration systems to reduce refrigerant leaks and maintain energy efficiency.
- Support continued improvements to refrigerant management program provisions and allowances for reclaim within servicing. For example, CARB could require leak detectors be used for systems containing greater than 50 lbs of charge.

We believe these measures balance environmental benefit with minimizing the cost impact on consumers, all while providing adequate time for manufacturers, distributors, and contractors to prepare for a safe and efficient transition to lower-GWP technologies.

We believe that our recommendations will help continue the tradition of California's leadership in technology and environmental regulations while providing market certainty which will benefit consumers and the industries that serve them.

Respectfully,

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