

October 30, 2015

Mr. Richard Corey, Executive Officer  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

RE: United Refrigeration, Inc. comments on Draft Short-Lived Climate Pollutant (SLCP)  
Reduction Strategy

Dear Mr. Corey,

United Refrigeration, Inc. (URI) appreciates the opportunity to comment on the Short-Lived Climate Pollutant Reduction Strategy Draft. This submission outlines a brief description of our organization, our comments regarding the SLCP reduction strategy as it relates to the draft, and our comments regarding the draft itself.

URI is a large, independently owned distributor of refrigeration, air conditioning and heating parts and equipment with locations in 44 states, including California. URI has been active in the collection of recovered refrigerants and is continually improving its collection program. Operating 24 wholesale locations and a regional warehouse within California, URI has a vested interest in the SLCP reduction strategy. Our distribution locations throughout the state allow for easy access by customers to refrigerant-related services including reclamation and transportation. URI's refrigerant management program has been embraced by contracting companies of all sizes.

URI agrees that the biggest reductions of refrigerant gas emissions result from robust refrigerant conservation programs like ARB's Refrigerant Management Program. The detection and repair of refrigerant leaks provides direct environmental benefits while allowing equipment owners to efficiently maintain and operate their installed base of equipment. Such actions are a proactive approach to ensure the responsible use of refrigerants by minimizing, and in many cases eliminating, the emissions of refrigerant gases.

URI supports ARB's proposal to allow the continued use of reclaimed refrigerant to serve equipment thereby allowing equipment owners to make an orderly transition to lower GWP refrigerants and technologies. We strongly urge ARB to provide for the sell-through of newly manufactured GWP refrigerants that are already in the supply chain so wholesale distributors are not left with unsaleable product or incur additional cost to remove the product from their locations in California.

URI appreciates that ARB recognizes that national and international agreements provide the most efficient way to reduce the supply of and emissions from the use of refrigerants with high GWPs. URI believes a market based approach facilitated via an international agreement that controls the production and consumption of refrigerants to be most effective. While incentive programs may seem attractive, they may unintentionally be causing more harm by



forcing the premature retrofit of well-maintained equipment. URI strongly encourages ARB to let the international process solidify the global approach to successful reduction of HFC emissions.

URI encourages ARB to critically look at the proposed strategy and consider the full cost impact. The regulation and management of refrigerants must be carefully considered to ensure that each step is well thought-out with a full understanding of the HFC industry including its contribution to societal benefits. We encourage ARB to construct the requirements so that they allow for technical feasibility, ease of implementation, energy efficiency, ease of enforcement, and consider the impact on the environment, consumers, small businesses, and the industry as a whole.

URI and many other wholesale distributors may have difficulty or be disadvantaged in obtaining and supplying refrigerant if an allocation system is enacted at the state level. Distribution companies may be impacted on what they can purchase which will increase refrigerant costs affecting many businesses and consumers.

We urge ARB to consider the impact of stringent state regulations on companies operating in multiple states. It becomes increasingly difficult to conduct business with a myriad of different regulations in each state. URI believes the refrigeration market in California will have difficulty aligning specific policies without putting their businesses at a disadvantage. We request that ARB strive to adopt regulations that are the result of international agreement and codified in Federal regulations.

Protection of the environment can only be achieved through the combined cooperative efforts of equipment owners, service technicians, equipment OEMs, chemical manufacturers, distributors and regulatory agencies. URI hopes that these comments have provided additional insight into the workings of the refrigeration and air conditioning industry. I am available to discuss these comments at a mutually convenient time.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Richard Rosen', followed by a long horizontal line extending to the right.

Richard Rosen, MES.  
Regulatory Compliance Manager  
United Refrigeration, Inc.