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Ms. Pamela Gupta

Manager  
Greenhouse Gas Reduction Strategy Section  
Research Division  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Re: Hussmann Corporation Comments – California Air Resources Board Proposed Regulation for Prohibitions on Use of Certain Hydrofluorocarbons in Stationary Refrigeration and Foam End-Uses 15-day language

Ms. Gupta:

These comments are submitted by Hussmann Corporation in response to California Air Resources Board (ARB) proposed 15-day language clarification to the regulation for Prohibitions on Use of Certain Hydrofluorocarbons in Stationary Refrigeration and Foam End-Uses issued on June 15, 2018.

Hussmann Corporation is a leading manufacturer of commercial refrigeration equipment sold in North America. Hussmann is an active participant in the regulation processes that impact commercial refrigeration display cases, rack systems, remote condensing, WICF systems, cold room storage, and other items which fall into food retail display and sale.

Thank you for the opportunity to provide comments. We support providing additional time to manufacturers by extending the compliance date to January 2019. We also support the prohibition date established as the date of manufacture, which we believe will be more easily understood by retailers.

However, we struggle with the definition for “new” equipment. It is our understanding that new equipment will be understood to be an increase in capacity which can include the addition of fuel lines and evaporators. This poses a problem for retailers who want to replace older less efficient display cases or unit coolers with newer more efficient equipment. It is very possible that a retailer replacing a section of a line-up may be able to add additional cases because the newer models have increased in efficiency. Per the definition of “new” this would require a replacement in the entire system because more evaporators and more fuel lines have been added due to greater efficiencies with newer display case equipment. Even a one-for -one replacement of an older display case which has one full length evaporator coil with a new modular case with multiple coils would be considered an increase in capacity and thus new equipment. We do not think this excessive cost burden to retailers is the intent of the revised language and ask that clarification be added which would allow retailers to purchase newer and more efficient product without replacing an entire system.

We are also concerned about record retention and labeling requirements. Manufacturers may not always sell directly to the retailer in the state of which the equipment is installed. It would be nearly impossible for an OEM to know where a distributor or even some retailers may eventually install the piece of equipment. Each piece of equipment does have a nameplate, which includes both a serial number and for self-contained equipment the type refrigerant. If the piece of equipment is ever questioned, this information could be used to trace the history of the equipment regarding the original purchase. Since refrigerants prohibited in California may still be permissible in other US States we would recommend use of the nameplate and serial number for a specific product in question.

Hussmann is a member of AHRI and fully supports comments made by AHRI regarding this regulation.

I appreciate the opportunity to provide these comments. If you have any questions regarding this submission, please do not hesitate to contact me.

Sincerely,

Ron Shebik

Director, Government and Regulatory Affairs

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