



## HOSHIZAKI AMERICA, INC.

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May 26, 2016

Mr. Dave Mehl  
California Air Resource Board  
1001 I Street, Sacramento, CA 95812  
Subject: Comments on Short Lived Climate Pollutants Reduction Strategy SLCP2016

To Whom It May Concern:

Thank you for looking out for our environment by proposing regulations for refrigerant use. However, there are many concerns for the proposed global warming potential (GWP) threshold for commercial refrigeration when it comes to Commercial Ice Makers.

Commercial Ice Makers are classified as ice makers that produce between 50 and 4000 pounds of ice per day. Commercial Ice Makers vary between type of ice (flaked or cubed) and the construction/condensing type (self-contained, modular air-cooled, water-cooled, or remote-cooled). They have many uses ranging from restaurant use in drinks, restaurant use in cooling product, hospital use, grocery store use, etc. The Environmental Protection Agency (EPA) has studied the use of the product and has classified the following refrigerants for Commercial Ice Makers as acceptable:

R-448A – 1387 GWP

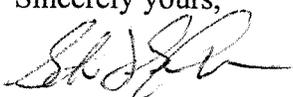
R-134a – 1430 GWP \*widely used in Commercial Ice Makers

R-404A – 3952 GWP\*widely used in Commercial Ice Makers

Reviewing the list of currently acceptable refrigerants by the EPA there are no viable options at this time for Commercial Ice Makers that are under 150 GWP. While Propane (R-290) is being considered for use with Commercial Ice Makers, there are two problems: R-290 is flammable and the federal limit for use in appliances is 150 grams. If R-290 was approved for use in Commercial Ice Makers, the limitation of only 150 grams would only allow the production up to about 400 pounds of ice/day. This would leave over 75% of the market unable to meet the proposal of using a refrigerant with a GWP less than 150. Tests done on various low GWP alternatives have proven to give high temperature glide that creates problematic issues in Commercial Ice Maker system design.

Hoshizaki America recommends that Commercial Ice Makers be exempted from this ruling at this time. Once the EPA approves viable alternatives that are economically feasible, commercially available, and also conducive to meeting the stringent Department of Energy minimum energy efficiency standards for 2018, the standards can be revised to include Commercial Ice Makers.

Sincerely yours,



Stephen Schaefer