



December 7, 2020

A-Gas Americas, Hudson Technologies and National Refrigerants, Inc. are hereby submitting comments in response to California Air Resources Board (CARB) proposed regulation on Prohibitions on Use of Certain Hydrofluorocarbons in Stationary Refrigeration, Chillers, Aerosols-Propellants and Foam End-Uses. All three companies are members of the Air Conditioning, Heating, & Refrigeration Institute (AHRI) and are EPA-certified reclaimers with reclamation business activities throughout the United States (US), including California. Collectively we have been reclaiming refrigerants for more than 30 years, well before it was required by law. We support the key objectives of the California Cooling Act and are offering these comments in support of CARB's initiatives to further protect the environment through a progressive refrigerant management program.

With more than 65 EPA-certified reclaimers, reclamation has successfully supported the HVACR industry in the US for the past twenty-five years, incorporating all generations of refrigerants, including CFCs, HCFCs, and HFCs. The use of certified reclaimed refrigerants helps mitigate the impact of refrigerant emissions on the environment and the reclamation industry is well positioned to support additional requirements related to the use of reclaimed refrigerant.

As CARB proceeds with finalization of their proposed rule, we encourage CARB to consider the following comments and recommendations to ensure that any requirements related to the required use of reclaimed R-410A refrigerant results in a verifiable program that protects the environment, maintains the integrity of the reclaimed refrigerant, and provides traceability while minimizing the cost impact to consumers:

- Require reclaimers to be registered to sell reclaimed R-410A refrigerant in California.
- Require cylinders of reclaimed R-410A to be clearly marked by the reclaimer to identify the contents as reclaimed R-410A.
- Establish a methodology wherein independent 3rd party verification of reclaimers would provide a consistent standard, confirm process compliance and ensure compliant certified reclaimed R-410A.
- Allow R-410A recovered from any US location to be reclaimed and sold in California.
- Allow a maximum content of 10% virgin refrigerant in reclaimed R-410A in order to ensure that out-of-ratio recovered R-410A can be reblended into the required AHRI700 ratio of components during the reclamation process.
- Allow the use of other recovered HFC refrigerants to make reclaimed R-410A. For example, R-407A and R-407C contain the two base refrigerants contained in R-410A. The inclusion of these recovered refrigerants improves the ability of the reclamation industry to utilize separation technologies to increase the supply of reclaimed R-410A.
- Prohibit the re-use of recovered R-410A that has not been reclaimed to prevent equipment failure which can result in release of the refrigerant as well as non-equipment related

warranty claims and increased repair costs to consumers. The reuse of recovered R-410A which has not been reclaimed presents traceability, reporting, and record-keeping issues.

We appreciate the opportunity to offer these comments and look forward to further engagement with CARB and other stakeholders to develop a robust refrigerant management program that protects the environment and provides a verifiable process for providing reclaimed R-410A in California.

Respectfully submitted,



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