

# HARDI

HEATING AIR-CONDITIONING REFRIGERATION DISTRIBUTORS INTERNATIONAL

December 7, 2020

Elizabeth Scheele  
California Air Resources Board  
1001 I Street, Sacramento, CA 95814  
P.O. Box 2815, Sacramento, CA 95812

Re: HARDI Comments Regarding California Air Resources Board Draft Proposed Regulation: *Prohibitions on Use of Certain Hydrofluorocarbons in Stationary Refrigeration, Stationary Air-conditioning, and Other End Uses*

Dear Ms. Scheele,

On behalf of Heating, Air-conditioning, & Refrigeration Distributors International (HARDI), I thank the California Air Resources Board (CARB) for allowing public comment on the draft proposed regulation: *Prohibitions on Use of Certain Hydrofluorocarbons in Stationary Refrigeration, Stationary Air-conditioning, and Other End Uses*.

HARDI is a trade association comprised of nearly 1,000 member companies, nearly 500 of which are US-based wholesale distribution companies. More than 80 percent of HARDI's distributor members are classified as small businesses that collectively employ over 35,000 U.S. manufacturing workers, representing more than \$35 billion in annual sales and an estimated 80 percent of the U.S. wholesale distribution market of heating, ventilation, air-conditioning and refrigeration (HVACR) equipment, supplies, and controls.

HARDI supports phasing down the use of hydrofluorocarbons (HFC) and transitioning to the next generation of refrigerants. HARDI supports the efforts of the U.S. Congress to pass the AIM Act because we believe federal action that provides a framework for a structured phasedown is the most effective way to reduce HFCs. HARDI has also worked with CARB on California's transition away from HFC refrigerants. It is HARDI's belief that the California regulations to meet SB 1383 can work with the federal phase-down of HFCs if done in a thoughtful manner and we want to thank CARB's staff for working with HARDI on this proposed regulation.

HARDI generally supports the timeline and GWP limits established for commercial refrigeration, however, as we have previously submitted, we are concerned about the timeline regarding stationary air-conditioning. HARDI is interested to see additional details regarding an alternative compliance plan for stationary air-conditioning as part of the 15-day notice. We appreciate the idea of an alternative compliance pathway and believe one is necessary due to issues regarding the acceptance of safety standards into the building codes.

State building codes must be updated to include safety standards for equipment using certain refrigerants below 750 GWP in order for the industry to transition. Of the OEMs that have announced future refrigerants, all have committed to the use of A2L refrigerants. These A2L refrigerants are in the lower-flammability category compared A3 refrigerants and burn at a slower rate than A2 refrigerants but do have flame propagation characteristics not seen in A1 refrigerants currently used by the industry.

Without these safety standards the industry will not be able to use a majority of refrigerants below 750 GWP that are seeking approval through the U.S. Environmental Protection Agency's Significant New Alternative Policy Program. In addition to needed safety standards for the installation of equipment using A2L refrigerants, the wholesale distribution industry will also need changes to the building and fire codes and DOT regulations for the storage and transport of lower-flammability refrigerants. The current code process will not be updated for storage until 2024.

HARDI has been a supporter of AHRI's proposal to set the transition date to January 1, 2025 and hope that the 15-day notice uses this transition date as well. Setting the transition date to 2025 will give the industry, code developers, and fire officials time to ensure all safety standards are in place to safely and effectively use these new refrigerants to meet the HFC reduction goals.

HARDI is encouraged by CARB's efforts on the proposed regulations and look forward to seeing the alternative compliance plan set forth in the 15-day notice.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alex Ayers', with a long horizontal flourish extending to the right.

Alex Ayers  
Director of Government Affairs  
Heating, Air-conditioning, & Refrigeration Distributors International