



May 28, 2021

A-Gas Americas, Hudson Technologies and National Refrigerants, Inc. are hereby submitting comments in response to California Air Resources Board's (CARB) Proposed Amendments to the 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, including California. Collectively we have been reclaiming refrigerants for more than 30 years, well before it was required by law.

We would like to support CARB's decision to allow a portion of virgin supply to be a part of the definition of certified reclaimed refrigerant. The maximum 15% in the current proposed rule is necessary to guarantee sufficient supply of reclaimed R-410A to meet the compliance obligations of the State of California and OEMs during this transition period.

Additionally, we recommend that the definition of "geographic location" related to the sourcing of recovered refrigerant be specified to encompass only the United States. We believe that establishing the United States as the geographic location for the source of recovered refrigerants supports the demand requirements for the program, and that extending the geographic location beyond the United States would create traceability challenges as documentation requirements for internationally recovered material is not aligned with EPA reporting requirements.

We appreciate the opportunity to offer these comments and look forward to continued 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,

Mike Armstrong
President
A-Gas Americas

Brian Coleman
President & CEO
Hudson Technologies

Maureen Beatty
Executive Vice President
National Refrigerants, Inc.