



# NATIONAL REFRIGERANTS, INC.

11401 Roosevelt Boulevard, Philadelphia, PA 19154

October 30, 2015

Mr. Richard Corey  
Executive Officer  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Re: Comments on Draft Short-Lived Climate Pollutant (SLCP) Reduction Strategy

Dear Mr. Corey,

National Refrigerants, Inc. (NRI) is an independent worldwide distributor of refrigerants and associated refrigerant management services. NRI is a packager, manufacturer, and EPA-certified reclaimer of refrigerants. In addition, NRI is the largest reclaimer in the US and the only Air Conditioning, Heating and Refrigeration Institute (AHRI) Certified Reclaimer. It supplies refrigerant products to over 50,000 customers that own and operate or service billions of dollars' worth of refrigeration and air conditioning equipment. These customers include businesses of all sizes, including, but not limited to, one and two truck service technician companies, corner grocery stores, supermarket chains, industrial plants, small commercial businesses, hospitals, government facilities, and schools.

NRI is a member of the Alliance for Responsible Atmospheric Policy (Alliance) and supports the comments submitted by the Alliance. NRI would like to provide additional comments on certain aspects of the SLCP strategy.

NRI applauds the Air Resource Boards (ARB) recognition of the benefits of using reclaimed refrigerant and supports their plan to allow the use of reclaimed refrigerant to service the installed base of equipment. However, NRI urges ARB to allow the international process to fully take shape before implementing an allocation system or bans on the sale and use of certain high GWP refrigerants. NRI believes that an international agreement implemented by the Federal government will provide the most cohesive and effective method to limit the use of high GWP refrigerants. Clean Air Act restrictions on the production of CFC and HCFC refrigerants have already proven successful at moving the refrigeration and air conditioning industry to more environmentally friendly refrigerants. A unilaterally administered state program will lead to confusion in the industry and make it difficult to conduct business in California.

NRI believes that strong refrigerant management programs provide the most effective means to control greenhouse gas emissions and applauds the Board's existing Refrigerant Management Program. The identification and repair of leaks provide the most immediate benefit to the environment when coupled with certified technicians who are properly trained. The use of incentive programs could actually be detrimental to the environment if equipment owners do not consider the total impact to the environment by switching to a refrigerant solely based on its GWP value and not considering the effect on system efficiency and energy consumption.

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NRI support actions to control greenhouse gas emissions and urges ARB to allow the international and federal processes to work while carefully considering the technical feasibility of any policy actions as well as the economic impact on consumers and the businesses affected by any regulatory actions.

NRI appreciates the opportunity to participate in ARB's SLCP strategy and is available to discuss our comments at your convenience.

Respectfully submitted,  
NATIONAL REFRIGERANTS, INC.

A handwritten signature in black ink that reads "Maureen Beatty". The signature is written in a cursive style with a large initial "M" and a long, sweeping tail on the "y".

Maureen Beatty  
Executive Vice President