

## REFRIGERANT PHASEOUT

R-22 ( a hydrochlorofluorocarbon; HCFC) is still being phased out under the Montreal Protocol Treaty, but efforts are already underway to phase out hydrofluorocarbon (HFC) refrigerants, like R410A. R-22 was phased out because it is an ozone depleting substance. R410A is going to be phased out because it has a high global warming potential (GWP).



## NATIONAL EFFORTS

The HVACR Industry, including the national contractor association – the Air Conditioning Contractors of America – are seeking a national phaseout schedule instead of a state-by-state approach. These efforts are being addressed with Members of Congress; who must give the EPA clear authority to address the phase-down schedules. Currently, the EPA does not believe it has the authority to regulate refrigerants that have high global warming potentials because Section 608 of the Clean Air Act is for ozone depleting substances. This could lead to the open-sale of refrigerants to consumers.



## STATE EFFORTS

Without a federal mandate, many states will implement their own phase-down schedules; creating a patchwork of refrigerant regulations and different types of refrigerants available in each state. California has already adopted a phaseout schedule, and New York, Washington, Maryland, Illinois, and a number of other states are following suit, but they have different schedules.



## CONTRACTOR CONCERNS

The replacements to HFCs will likely include a mix of flammable and mildly flammable refrigerants (designated as A3 / A2 / and A2L by ASHRAE Standard 34), and ACCA is working to address a number of concerns, including:



- Will contractors/technicians be required to have HAZMAT certifications to transport these products and will they be required to stop at rail crossings?
  - How will we guarantee that contractors and technicians are trained on the safe use and handling of flammable refrigerants?
  - How will consumers be certain that their system was properly charged and not compromised with mixed refrigerants?

## ACCA EFFORTS

ACCA has begun the development of a flammable refrigerant educational program to address the training concerns. There are still too many unanswered questions about the use of the next generation of refrigerants; how they are to be safely applied in the field, what sensors/controls may be required, maximum quantities of refrigerant that may be used in a conditioned space, etc.

A hasty state-by-state approach to phasing out HFC refrigerants is dangerous for contractors, technicians, consumers, and every building that contains an air conditioning system. By giving the EPA the authority to implement the HFC phaseout, there is more certainty that there will be uniformity in the phase-out schedules, training, transportation issues, the codes process, and the other areas of concern to the HVACR industry.