

EPA Regulatory Update



Dave Godwin – US EPA
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Outline

- ▶ HCFC Phaseout / 2010 Milestone
 - Montreal Protocol and U.S. Clean Air Act
 - HCFC-22 Supply & Demand
 - System Manufacturing & Start-Up
- ▶ Pre-Charged Products Ban
- ▶ Leak Repair Rule

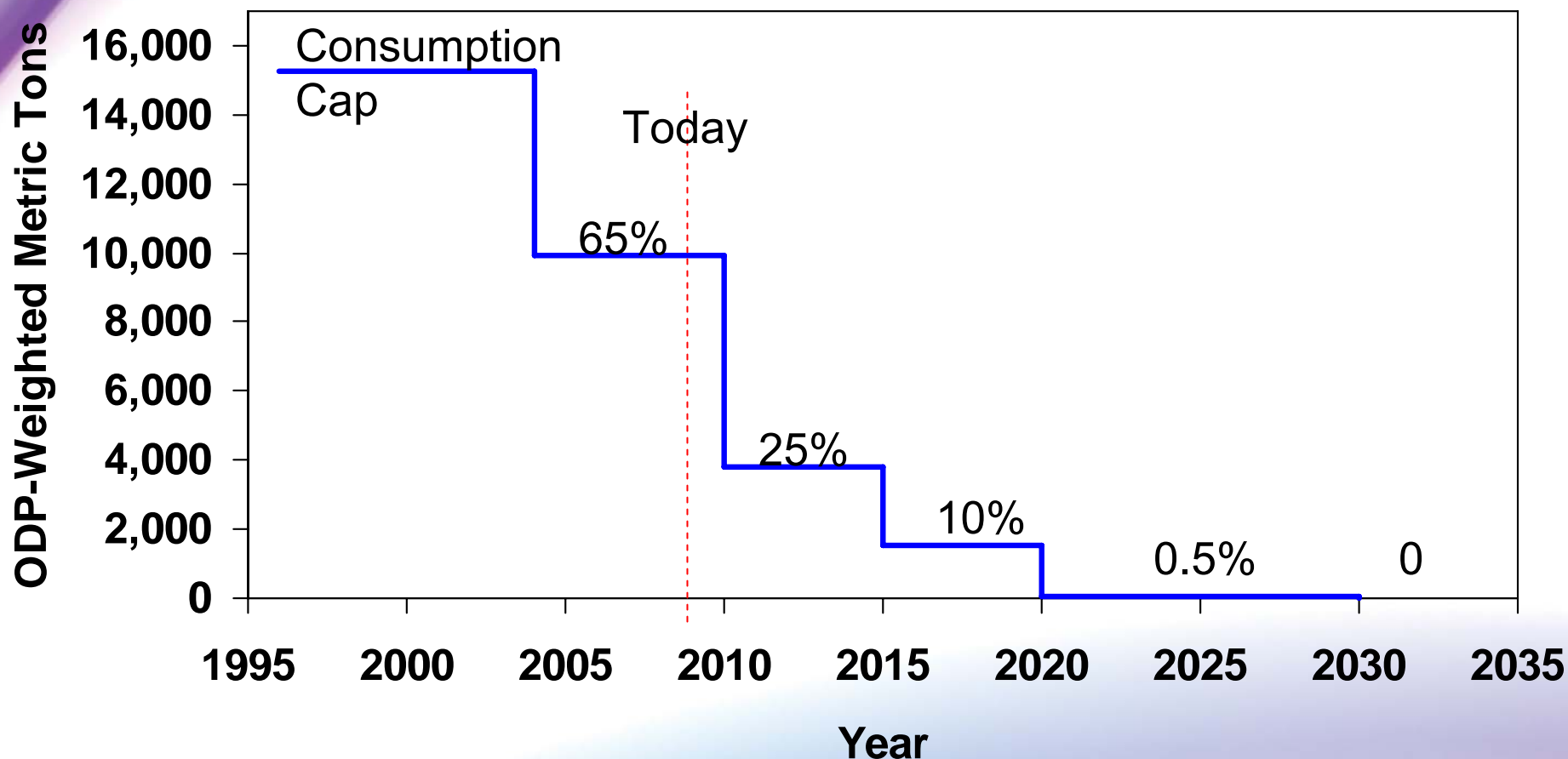
Montreal Protocol

- ▶ International agreement to phase out ozone-depleting substances
- ▶ Purpose is to repair & protect the ozone layer
 - Reduces incidences, deaths from skin cancer
- ▶ Refrigeration industry has contributed to Protocol's success
 - Restoring ozone layer; reducing effects of overexposure to UV
 - Significant climate change benefits

HCFC Phaseout Under the MP

- ▶ Under Montreal Protocol U.S. must reduce HCFC consumption
 - Freeze on HCFC consumption started in 1996
 - Reductions in 2004, 2010, 2015, 2020
 - Complete HCFC phaseout in 2030
- ▶ Major 2007 Adjustment to the Montreal Protocol
 - More aggressive 2010 reduction
 - Step-down requirements for developing countries

HCFC Phaseout Schedule



How the U.S. Meets the MP

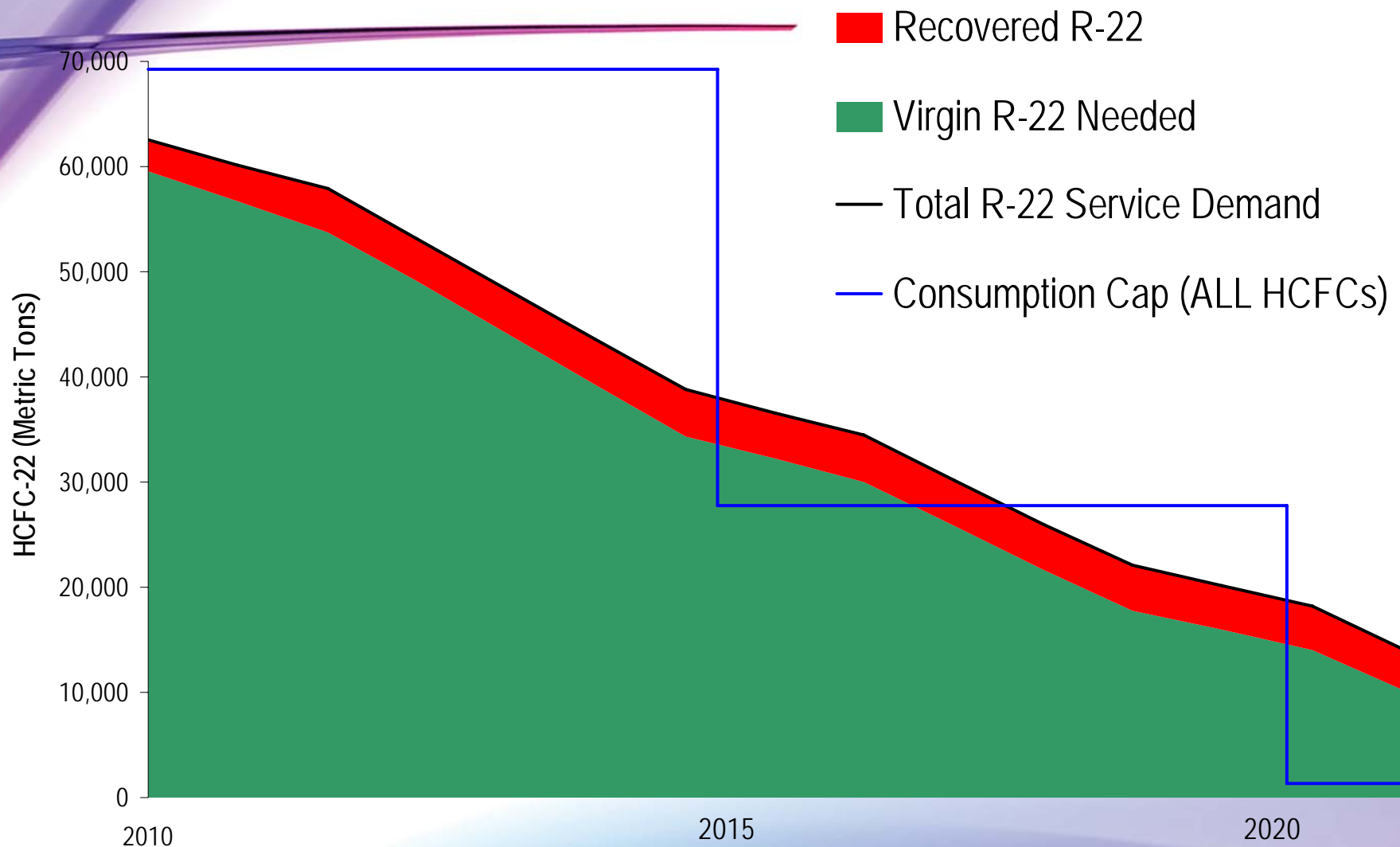
- ▶ Chemical-by-chemical (“worst-first”) phaseout of production and import
- ▶ 2003: HCFC-141b (foams)
- ▶ 2010: HCFC-22, -142b (except for servicing equipment manufactured before 1/1/2010)
- ▶ 2015: Use ban (except refrigeration & AC)
- ▶ 2020: HCFC-22, -142b (except reclaimed)
- ▶ 2030: All HCFC production and import stops

What You Need to Do

- ▶ You don't have to stop using HCFC-22
- ▶ Not necessary to replace existing equipment
- ▶ Service existing HCFC-22 equipment as usual
- ▶ After 2010, supplies of HCFC-22 will be more limited; very tight in 2015
- ▶ After 2020, only stockpiled or reclaimed supplies will be available

HCFC-22 Supply and Demand

www.epa.gov/ozone/title6/phaseout/class2.html



Who Imports/Produces HCFC-22?

- ▶ ABCO Refrigeration Supply
- ▶ Air Systems
- ▶ Altair Industries
- ▶ Arkema
- ▶ Automatic Equipment Sales of VA
- ▶ Condor Products Company, Inc.
- ▶ Coolgas Investment Property, LLC.
- ▶ Discount Refrigerants
- ▶ DuPont Company
- ▶ Full Circle
- ▶ HG Refrigeration Supply
- ▶ Honeywell
- ▶ INEOS Fluor
- ▶ Kivlan & Co. (Dynatemp)
- ▶ Klomar Ship Supply
- ▶ MDA Manufacturing
- ▶ Mondy-Global
- ▶ National Refrigerants
- ▶ Refricenter of Miami
- ▶ Refricentro
- ▶ R-Lines
- ▶ Saez
- ▶ Solvay Fluorides
- ▶ Solvay Solexis, Inc.
- ▶ TESCO Distributors

Restrictions on HCFC-22 Use

- ▶ HCFC-22 may be produced for use as a refrigerant in equipment manufactured before 1/1/2010
- ▶ When is a refrigeration system manufactured?
 - Pre-charged products vs. field-erected systems
 - Refrigerant loop complete?
 - Holds the complete and proper charge?
 - Ready for use for its intended purpose?
 - System started up and operational?
- ▶ EPA will issue rule addressing this issue and giving “allocations” for continued HCFC-22 production
 - Expect proposal late 2008
 - Expect final rule summer 2009

Pre-Charged Products Ban

- ▶ Clean Air Act restricts imports of HCFCs in bulk – but not after charged into AC & refrigeration equipment
- ▶ EPA is proposing to ban:
 - sale & distribution in interstate commerce of
 - all AC & refrigeration equipment containing
 - HCFC-22 and/or -142b
- ▶ May include any pre-charged components or stand-alone cabinets you buy
- ▶ Proposal under White House (OMB) review

Leak-Repair Rule

- ▶ Proposed Rule may affect:
 - Leak repair trigger rates (today: 35% refrig, 15% AC)
 - Verification of repairs (today: 30 days to complete repairs)
 - Conversion from ODS to HFC alternatives (must be SNAP acceptable)
 - Disposition of recovered refrigerant (no venting ODS or HFCs)
 - Full charge determinations
 - Conversion checklists
 - Record-keeping requirements
- ▶ Proposal submitted to OMB August 2008

Summary – 3 Rules to Look For

▶ Allocation Rule

- Limits on HCFC-22 production and consumption
- When is a system manufactured?

▶ Pre-Charged Products Ban

- Vending machines, stand-alone cabinets, outside AC units, etc.

▶ Leak-Repair Rule

- Trigger rates for repair
- Full charge determination
- Record keeping requirements

▶ Proposals expected this year / early next year



Thank You!

Contacts

▶ Allocation Rule

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▶ Pre-Charged Products Rule

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▶ Leak-Repair Rule

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▶ www.epa.gov/ozone/title6/index.html