



The Alliance
for Responsible Atmospheric Policy

September 8, 2014

VIA E-MAIL

a-and-r-docket@epa.gov

Attn: Docket ID No. EPA-HQ-OAR-2013-0748

Re: Protection of Stratospheric Ozone: Listing of
Substitutes for Refrigeration and Air
Conditioning and Revision of the Venting
Prohibition for Certain Refrigerant Substitutes

Dear Sir or Madam:

I am writing on behalf of the Alliance for Responsible Atmospheric Policy (“Alliance”) to provide comments regarding EPA’s **Proposed Rule on Protection of Stratospheric Ozone: Listing of Substitutes for Refrigeration and Air Conditioning and Revision of the Venting Prohibition for Certain Refrigerant Substitutes. 79 Fed. Reg. 38811. (July 9, 2014)**

The Alliance is an industry coalition organized in 1980 to address the issue of stratospheric ozone depletion and the production and use of fluorocarbon compounds. It is composed of manufacturers and businesses, including their trade associations, which rely on HCFCs and HFCs. Alliance companies represent approximately 90 percent of US HFC production and imports and a significant majority of the user industries. According to a recent study, the US fluorocarbon using and producing industries contribute more than \$158 billion annually in goods and services to the US economy, and provide employment to more than 700,000 individuals with an industry-wide payroll of more than \$32 billion (Steed, 2013). Today, the Alliance coordinates the participation of its industries in the development of reasonable international and government policies regarding ozone protection and climate change. The Alliance has a long history of working in a positive manner with EPA on the protection of stratospheric ozone and climate change. A list of Alliance member companies is attached. Member companies will also submit written comments as they see fit.

The Alliance is generally supportive of this SNAP listing rule proposal. The listing of new alternatives places new products on the market and empowers user industries and consumers to determine which products best meet their needs. The SNAP program works most effectively when used as a means of complementing the market. With that objective in mind, the Alliance commends EPA for its decision to bundle these proposed listings. As opposed to releasing

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SNAP approvals individually, bundling allows industry stakeholders to respond more quickly to these regulatory changes for the benefit of the consumer and the environment.

The Alliance is proud of the significant industry effort, highlighted by these new listing proposals, to develop more climate-friendly alternatives to high global warming potential compounds and compatible applications. The many millions of dollars invested by the producer and user industries stand as testament to the vital importance of the private sector in facilitating progress on ozone protection and climate change.

On the topic of waiving venting prohibitions for hydrocarbon refrigerants, the Alliance believes that regulations or restrictions on refrigerants should be adopted as appropriate to each type of refrigerant. The Alliance also believes all refrigerants should be properly managed, and has some concern about whether the proposed exemptions may have the unintended consequence of creating confusion regarding proper service procedure. The appropriateness of waiving this prohibition requires ongoing consideration and examination, particularly as applications for flammable refrigerants are expanded and charge sizes increase.

On other issues that EPA has raised in the proposed rule:

The Alliance supports the use of separate servicing fittings for flammable refrigerants as a helpful warning system beyond labeling and color coded hosing and piping. These fittings would require the technician to actually recognize that the system uses flammable refrigerants, thereby requiring additional caution and care during servicing.

Additionally, the Alliance supports required training for technicians in the safe handling of flammable refrigerant substitutes in the same way technicians must be certified in the proper handling of ozone depleting refrigerants before working with them.

While EPA does cite the current Underwriters Laboratories standard (UL 484) on the safety of room air and portable air conditioners, which includes charge limit sizes for refrigerants, there was no reference in the text of the proposed rule to the recently released Report of UL 60335-2-40, Joint Task Group, Working Group 1 (JTG WG1). UL Standard 484 will be transitioned into UL Standard 60335-2-40 for air conditioning products in the next few years. The Joint Task Group report reflects considerable effort by the members of several working groups and would update the charge limits for certain refrigerants in the current and future UL standards. The Alliance believes it is important that SNAP and the applicable US safety standards be harmonized. EPA should monitor any transition of UL Standard 484 into UL Standard 60335-2-40 and, should that transition be achieved, at that time EPA should consider if it needs to make any changes in its SNAP listings to reflect that new standard.

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Conclusion

The Montreal Protocol and the Clean Air Act Title VI implementation have succeeded because they have relied on long-term management principles in order to achieve the desired environmental policy objectives. SNAP listing approval complements the market by providing consumers with additional available products from which to choose.

The membership of the Alliance is proud of the industry contribution to the development of alternatives to high-GWP compounds and their implementation in equipment and products. The Alliance thanks EPA for providing an opportunity to comment and looks forward to working with the agency in a constructive manner to achieve completion of this proposal. If you have any questions, please feel free to reach me at fay@alliancepolicy.org or 703-243-0344.

Sincerely,

A handwritten signature in black ink, appearing to read 'KF' followed by a stylized flourish.

Kevin Fay
Executive Director
Alliance for Responsible Atmospheric Policy

MEMBERS

AGC Chemicals Americas	Golden Refrigerant
A-Gas/RemTec	Halotron
Air Conditioning, Heating & Refrigeration Institute	Heating, Airconditioning & Refrigeration Distributors International
Airgas	Honeywell
American Pacific Corp.	Hudson Technologies
Arkema	ICOR International
Association of Home Appliance Manufacturers	IDQ Holdings
Auto Care Association	Ingersoll-Rand
Bard Manufacturing Co.	International Pharmaceutical Aerosol Consortium
BASF	Johnson Controls
Brooks Automation, Inc.	Lennox International
Cap & Seal Company	Metl-Span Corporation
Carrier Corporation	Mexichem Fluor Inc.
Center for the Polyurethanes Industry	Midwest Refrigerants
Combs Gas	Mitsubishi Electric
Daikin Applied	National Refrigerants
Danfoss	Owens Corning Specialty & Foam Products Center
DuPont	Rheem Manufacturing Company
Dynatemp International	Ritchie Engineering
Emerson Climate Technologies	Solvay
E.V. Dunbar Co.	Sub-Zero
Extruded Polystyrene Foam Association	The Dow Chemical Company
Falcon Safety Products	Trane Company
FP International	Whirlpool Corporation
	Worthington Cylinder