



Refrigerant Management Update

MCTA Annual Meeting

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Final HFC Management Rule

**40 CFR 84, Subpart C published in
Federal Register 10/11/2024**

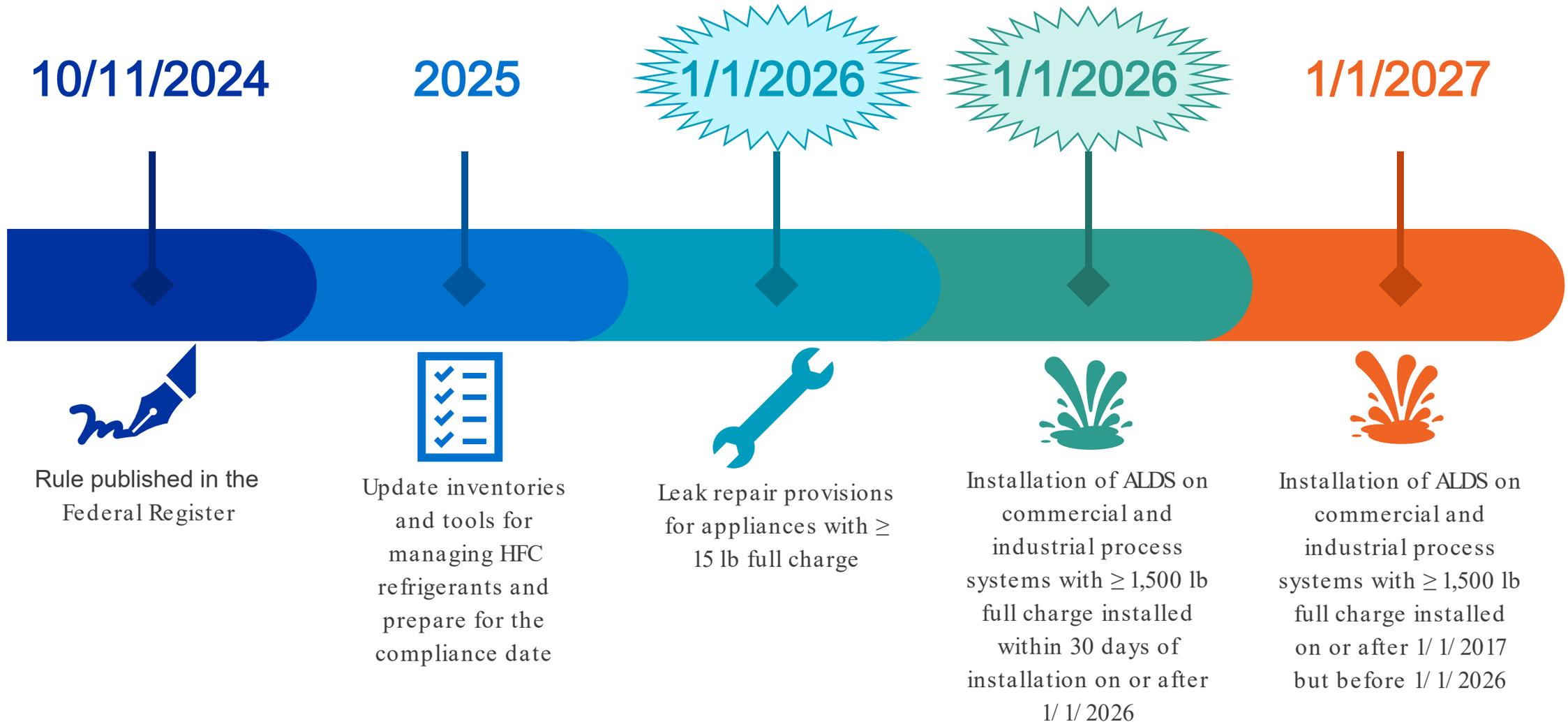
Most requirements similar to 40 CFR 82,
Subpart F (ODS) leak repair except:

- ▶ Lower full charge threshold for required repair
- ▶ Automatic Leak Detection Systems (ALDS) required for commercial and industrial systems with full charge $\geq 1,500$
- ▶ More information required to be included on chronic leaker report
- ▶ Heel recovery when disposing of cylinders

Applies to systems with
HFC or substitute
refrigerant with GWP > 53

15 lb full charge capacity
limit for leak repair
requirements except for
residential and light
commercial HVAC

Compliance Dates for HFC Management Rule





Technology Transitions Rule

- ▶ Final rule published in Federal Register 10/24/2023
- ▶ Establishes restrictions on the use of regulated substances by GWP in sectors or subsectors with dates of 1/1/2025, 1/1/2026, 1/1/2027, and 1/1/2028:
 - Includes aerosol products, foam products, and refrigeration, air conditioning, and heat pump systems/products (RACHP)
- ▶ Does not restrict the continued use of any existing products or systems, but defines distinction between maintenance and installation of new system
- ▶ Requires labeling of all new products and components using HFCs
- ▶ Includes reporting, import, and export provisions

<https://www.epa.gov/climate-hfcs-reduction/regulatory-actions-technology-transitions>



Comparison to Massachusetts Regs (310 CMR 7.76)

- ▶ Published December 2020
- ▶ Establishes restrictions on the use of regulated substances **by compound** in sectors or subsectors with latest implementation date of 1/1/2024
- ▶ Does not restrict the continued use of any existing products or systems, except for some retrofits
- ▶ Requires labeling of all new products and components using HFCs

[https://www.mass.gov/info -details/prohibitions -on-the-use-of-certain -hydrofluorocarbons -310-cmr-776](https://www.mass.gov/info-details/prohibitions-on-the-use-of-certain-hydrofluorocarbons-310-cmr-776)



Questions?