

<b>DOCKETED</b>	
<b>Docket Number:</b>	21-IEPR-06
<b>Project Title:</b>	Building Decarbonization and Energy Efficiency
<b>TN #:</b>	239473
<b>Document Title:</b>	Presentation - IEPR Commissioner Workshop on Building Decarbonization Embodied Carbon and Refrigerants Reducing Hydrofluorocarb
<b>Description:</b>	S2.4A_Helen Walter-Terrinoni_AHRI
<b>Filer:</b>	Raquel Kravitz
<b>Organization:</b>	Air-Conditioning, Heating, & Refrigeration Institute (AHRI)
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	8/25/2021 3:29:29 PM
<b>Docketed Date:</b>	8/25/2021

# IEPR Commissioner Workshop on Building Decarbonization: Embodied Carbon and Refrigerants Reducing Hydrofluorocarbon (HFC) Emissions

Helen Walter-Terrinoni

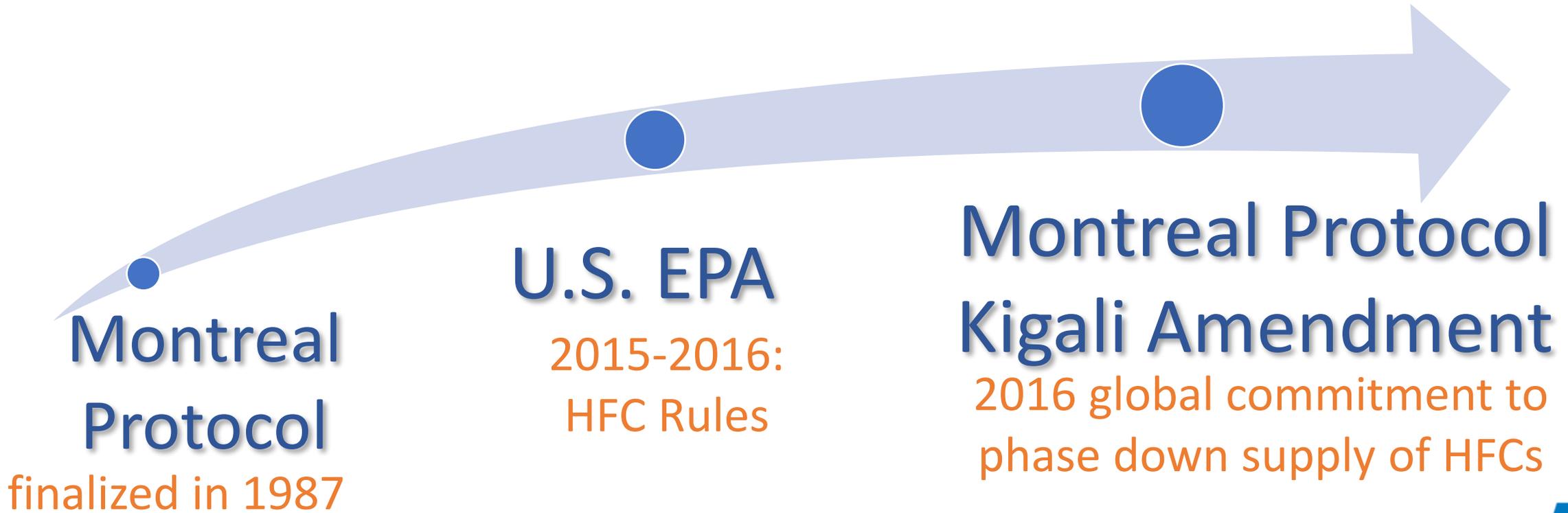
VP Regulatory Affairs

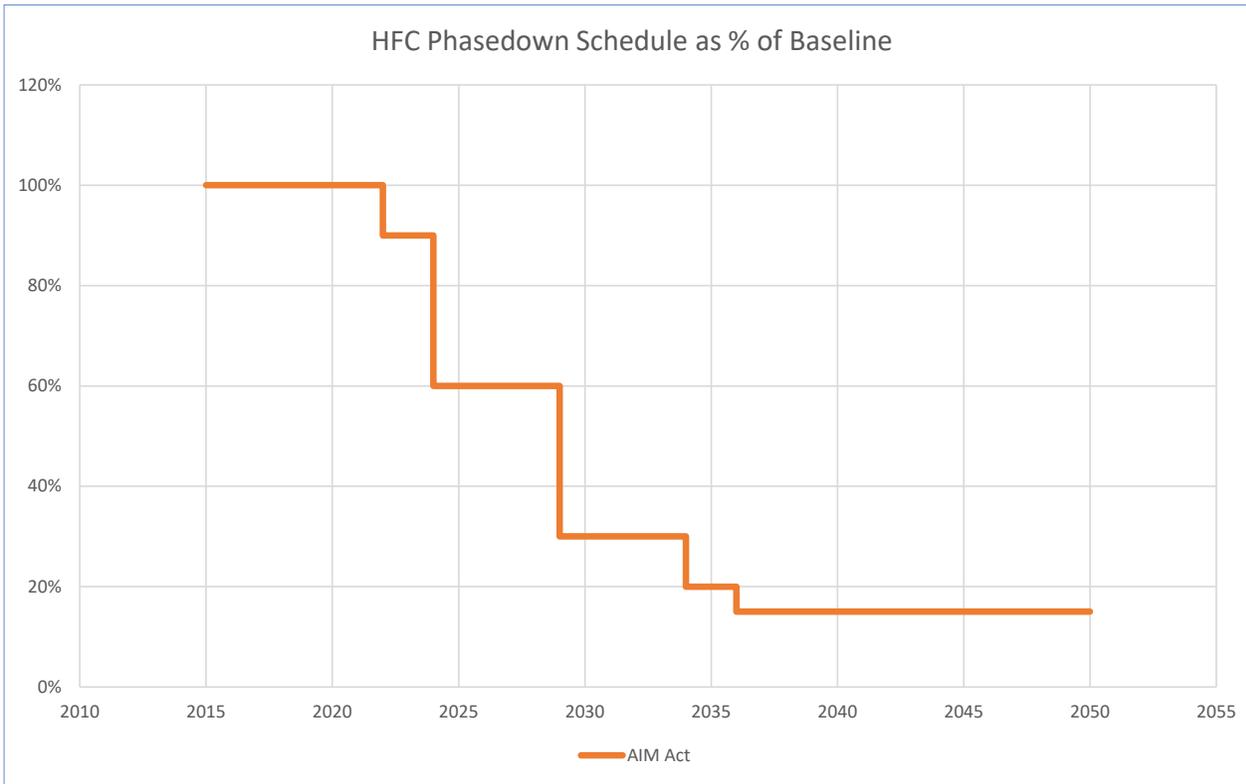
The Air Conditioning, Heating and Refrigeration Institute

[Hwalter-Terrinoni@ahrinet.org](mailto:Hwalter-Terrinoni@ahrinet.org)

# Monumental Success

Strong stakeholder input → Strong stakeholder support





Success!

Process allows for significant Industry and other stakeholder input → strong stakeholder support

# The AIM Act & The Kigali Amendment

Phase down supply and production of HFCs

- 2011-2013 baseline:
  - 2022: 10% reduction
  - 2024: 40% reduction
  - 2029: 70% reduction
  - 2034: 80% reduction
  - 2036: 85% reduction

The HFC phase-down is designed to create an economic supply imbalance with demand.

## Reduced Supply Economics

- Scarcity
- Increased Prices

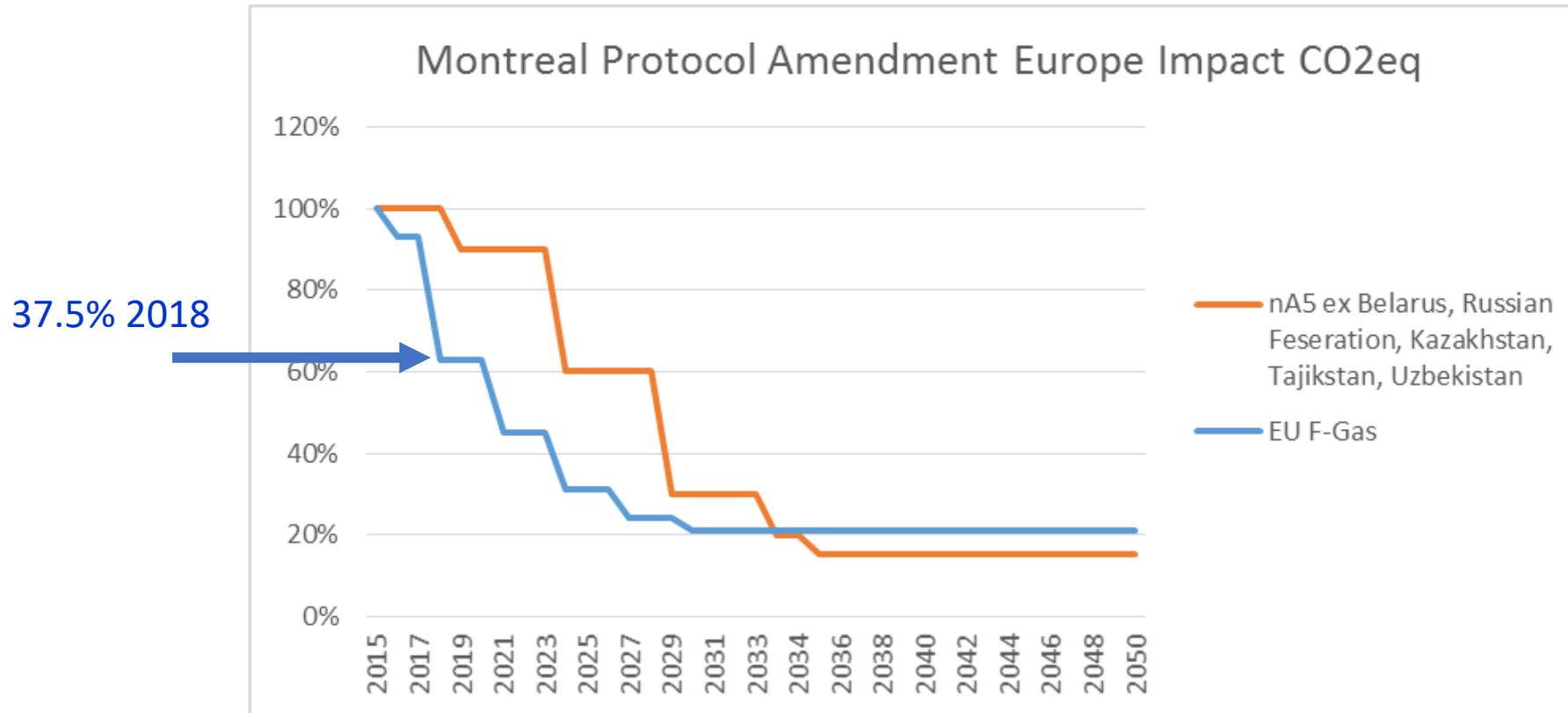


# A Chaotic Transition

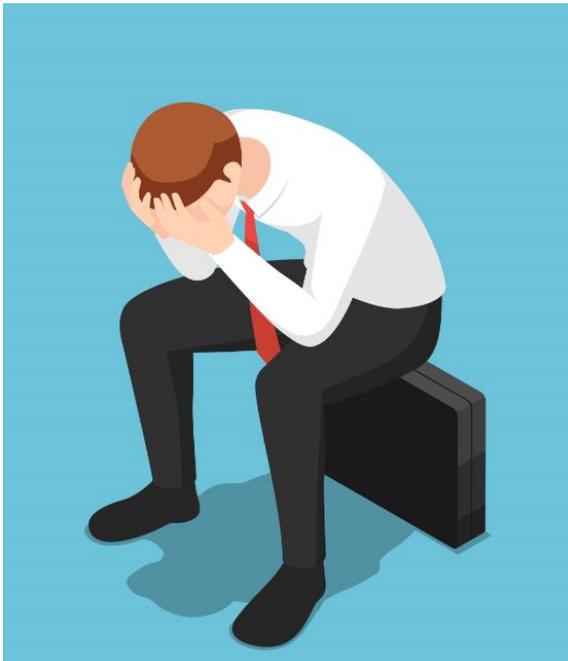
Lessons Learned in Europe

# European Union Fluorinated Gas (F-Gas) Regulations

## Supply reductions outpaced demand reductions!!!



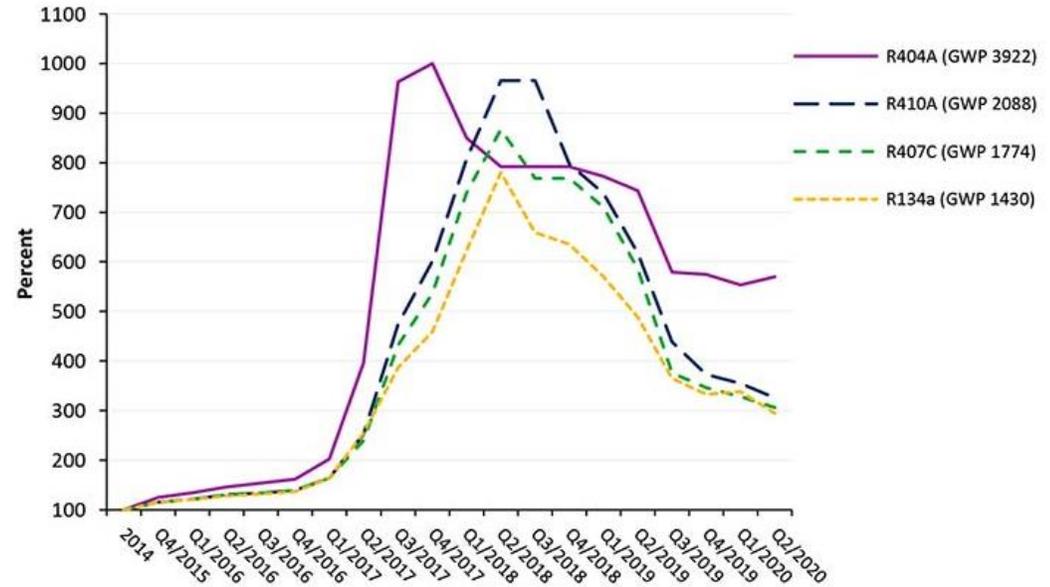
# European Impact: Retailers, End- users and OEMs



- The Cooling Post 2020

## Refrigerant demand and prices

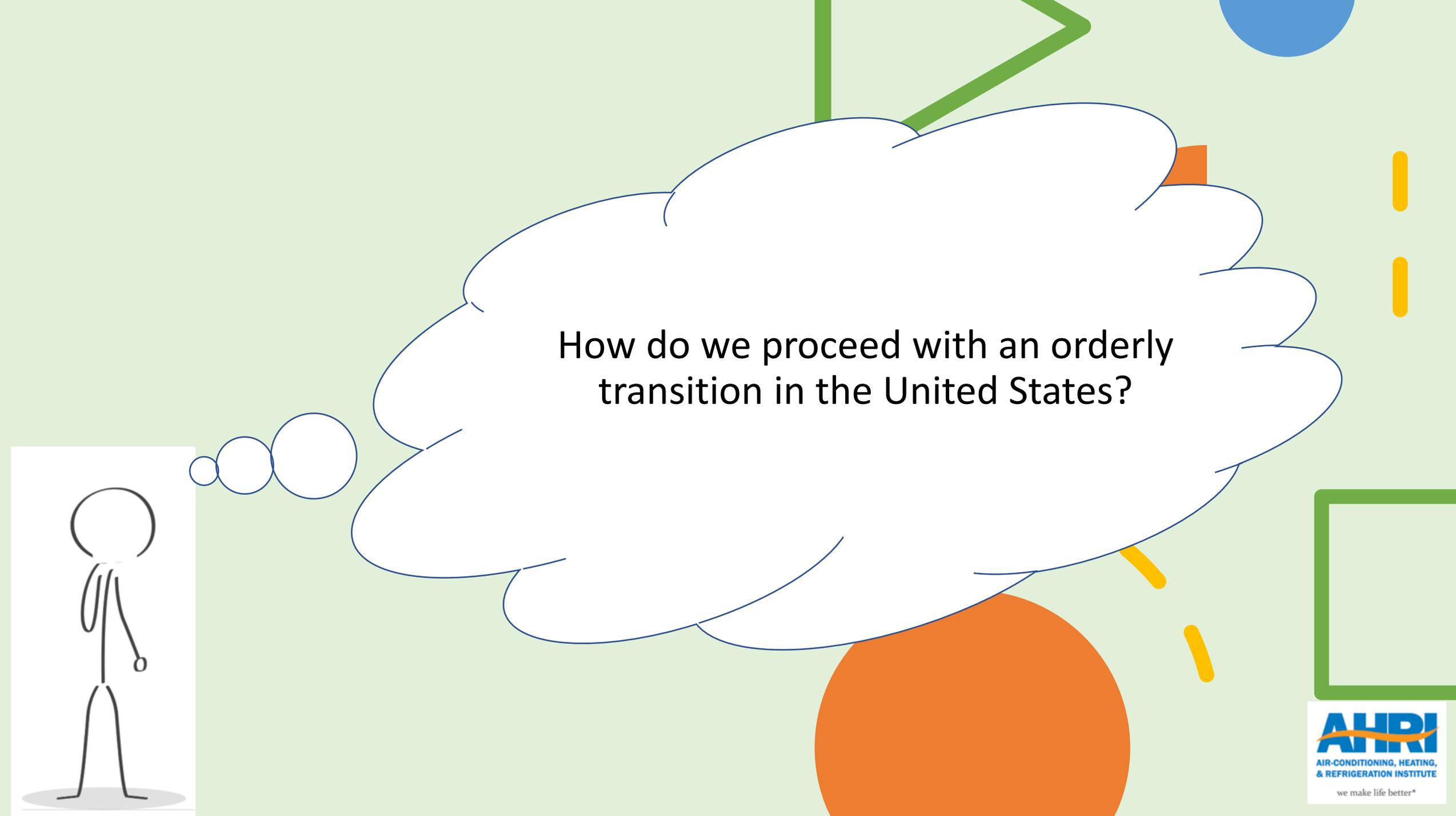
29 SEP 2020



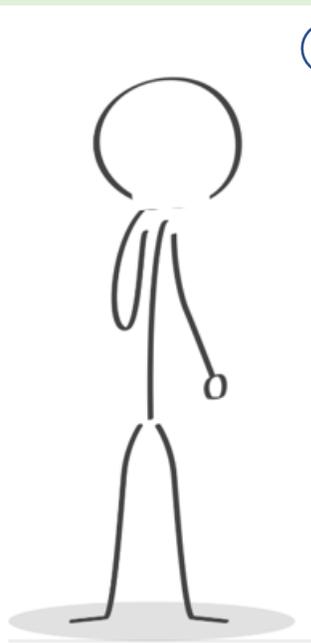
Average purchase prices reported by three large refrigerant distributors. Prices are indexed to the baseline year 2014

EUROPE: The effects of Covid-19 are held at least partly responsible for a fall in refrigerant demand and prices in the quarter to September.

The refrigerant price trends are recorded in the latest report from German consultancy Öko-Recherche.



How do we proceed with an orderly transition in the United States?





There are options.  
Doing nothing isn't  
one of them.



2024: Allocation 40% Reduction

2024: AIM Act Petitions  
Reclaimed refrigerants  
Smaller charge sizes  
Retrofit equipment  
Reduce leaks  
New Architectures for retailers

# Balancing supply and demand

Be Proactive!

Demand  
reductions  
coordinated  
with supply  
reductions

Regulations limiting hydrofluorocarbon (HFC) use for equipment (e.g. heat pumps)

- HFC or refrigerant blend bans
  - EPA and California Air Resources Board (CARB) HFC Regulations
- Global Warming Potential (GWP) limits
  - 2<sup>nd</sup> CARB HFC Regulations
  - AHRI AIM Act Petition to limit GWP to 750 in 2025

# Better refrigerant management: Increased recovery and of reclaimed refrigerants



Courtesy of A-Gas

# Better Refrigerant Management: Less leaks

**Global: ~52% of global  
“GWP” is used to charge  
leaking equipment**

United Nations Environment Program Fact Sheet

Figure 4 Markets using HFCs, % of tonnes CO<sub>2</sub> 2012

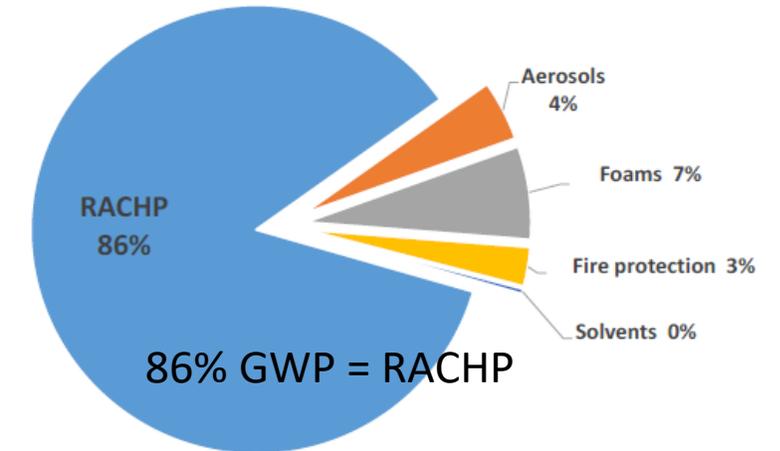
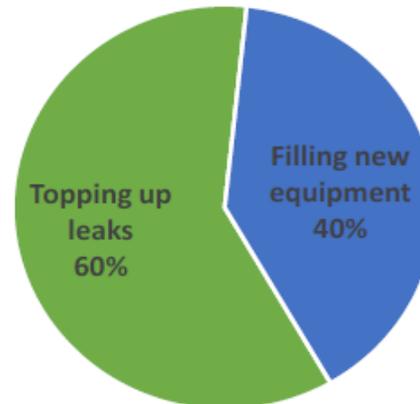
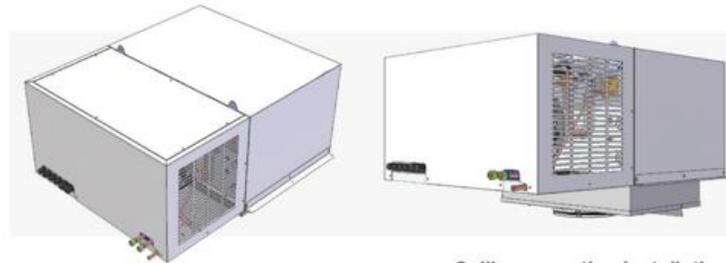


Figure 6: HFC use for topping up leaks in RACHP



60% of the 86% = topping up leaks = 52%



Ceiling mounting installation

## Applications in Retail Food Equipment

- Medium Temperature display
  - Reach-In
  - Dairy & Deli
  - Bakery goods
  - Meat & Seafood
  - Beverage
- Low Temperature display
  - Reach-Ins
  - Islands/"Coffins" (often air-cooled)
- Walk-in cooler/freezers
  - Packaged units
- Larger equipment is often water-cooled—i.e., connected to a water loop in a micro-distributed system

# Existing System Designs In Commercial Refrigeration (US/Canada) – Retail and Food Service

<span style="color: green;">■</span>	A1 Non-Flammable
<span style="color: purple;">■</span>	A2L Mildly Flammable
<span style="color: red;">■</span>	A3 Flammable

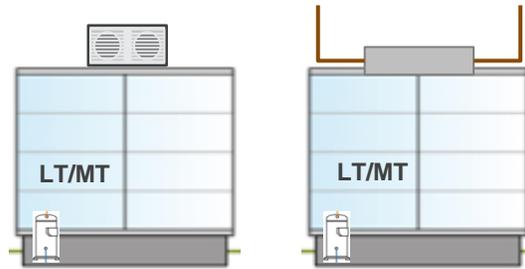
## Packaged Units – Cold Rooms



- A1 (~10s lbs)
- A3 (150 g)

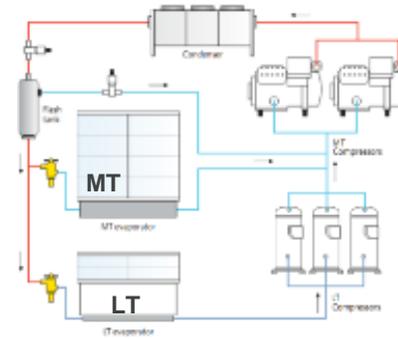
## Integrated Case (A/W/R Cooled)

Micro / Macro Distributed



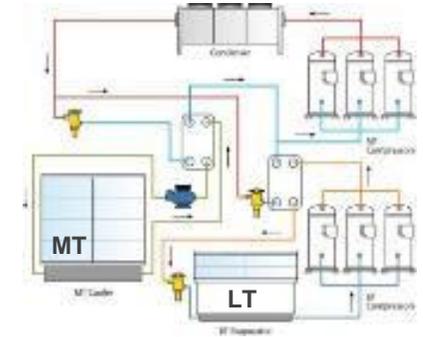
- A1 (~10s lbs)
- A3 (150 g)

## CO2 Transcritical



■ CO<sub>2</sub>

## Hybrid/Cascade



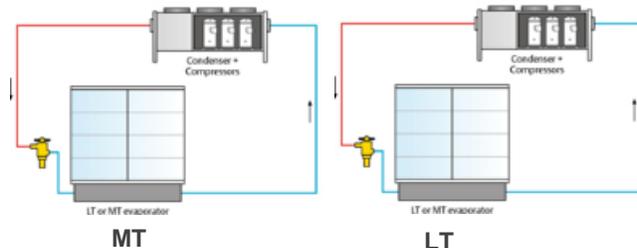
■ CO<sub>2</sub> ■ A1 (~1000s lbs)

## Remote Condensing Units



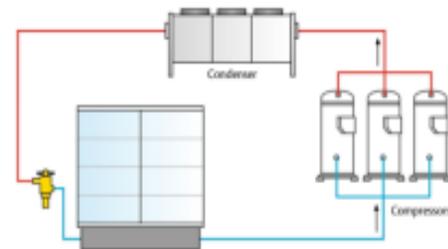
■ A1 (up to 100s lbs)

## Distributed Units



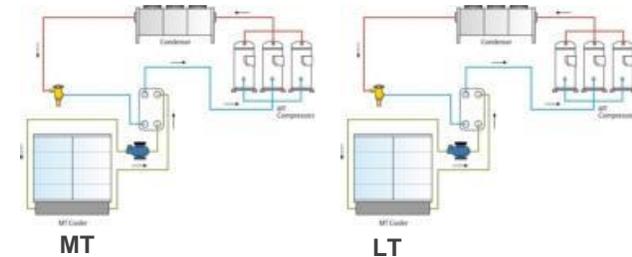
■ A1 (~100s to ~1000 lbs)

## Central Racks



■ A1 (~1000s lbs)

## Indirect (Glycol, CO2 or other sec fluid)



■ A1 **AHRI**  
AIR-CONDITIONING, HEATING,  
& REFRIGERATION INSTITUTE  
we make life better®

# Future System Designs In Commercial Refrigeration

## With Updated Mechanical, Electrical & Refrigerant Flammability Safety Standards/Codes

<span style="display:inline-block; width:15px; height:10px; background-color:lightgreen;"></span>	A1 Non-Flammable
<span style="display:inline-block; width:15px; height:10px; background-color:lightpink;"></span>	A2L Mildly Flammable
<span style="display:inline-block; width:15px; height:10px; background-color:red;"></span>	A3 Flammable

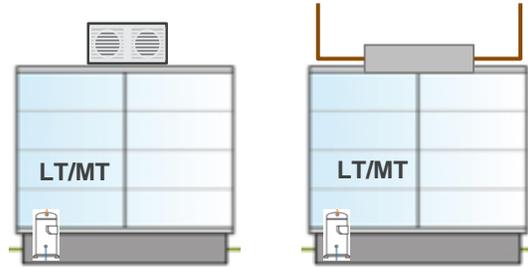
### Packaged Units – Cold Rooms



- A1 (~10s lbs)
- A2L (~4 kg)
- A3 (300 g)

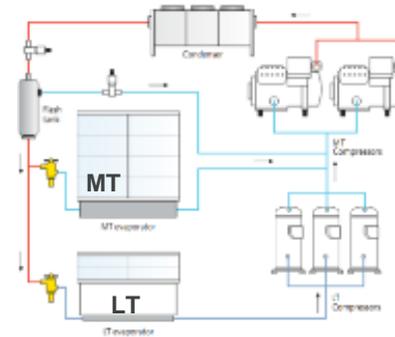
### Integrated Case (A/W/R Cooled)

Micro / Macro Distributed



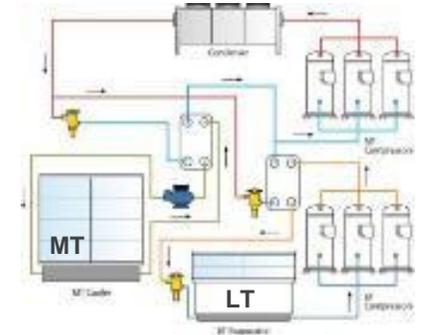
- A1 (~10s lbs)
- A2L (~4 kg)
- A3 (300 g)

### CO2 Transcritical



CO<sub>2</sub>

### Hybrid/Cascade



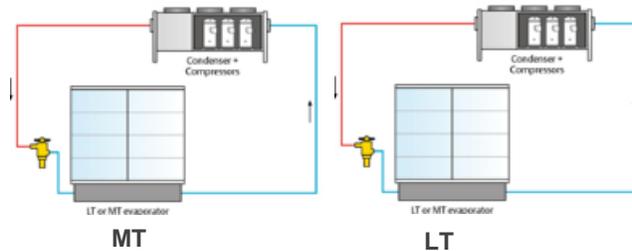
CO<sub>2</sub>  A1 (~1000s lbs) ?  
 A2L (~170 lb)

### Remote Condensing Units



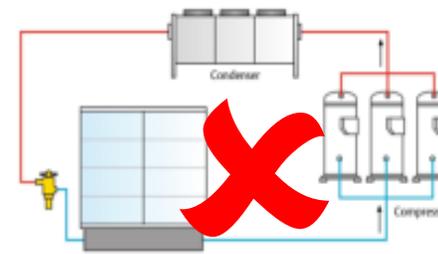
- A1 (up to 50 lbs)
- A2L (~170 lb)

### Distributed Units



- A1 (50 lb)
- A2L (~170 lb)

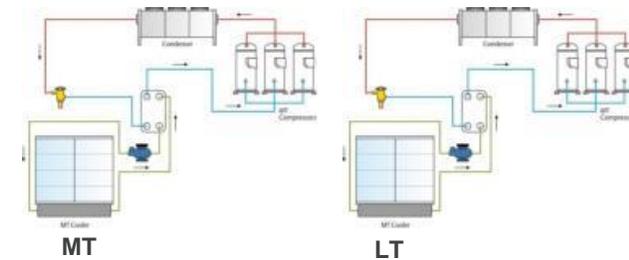
### Central Racks



LT and MT racks

A1 (~1000s lbs)

### Indirect (Glycol, CO2 or other sec fluid)



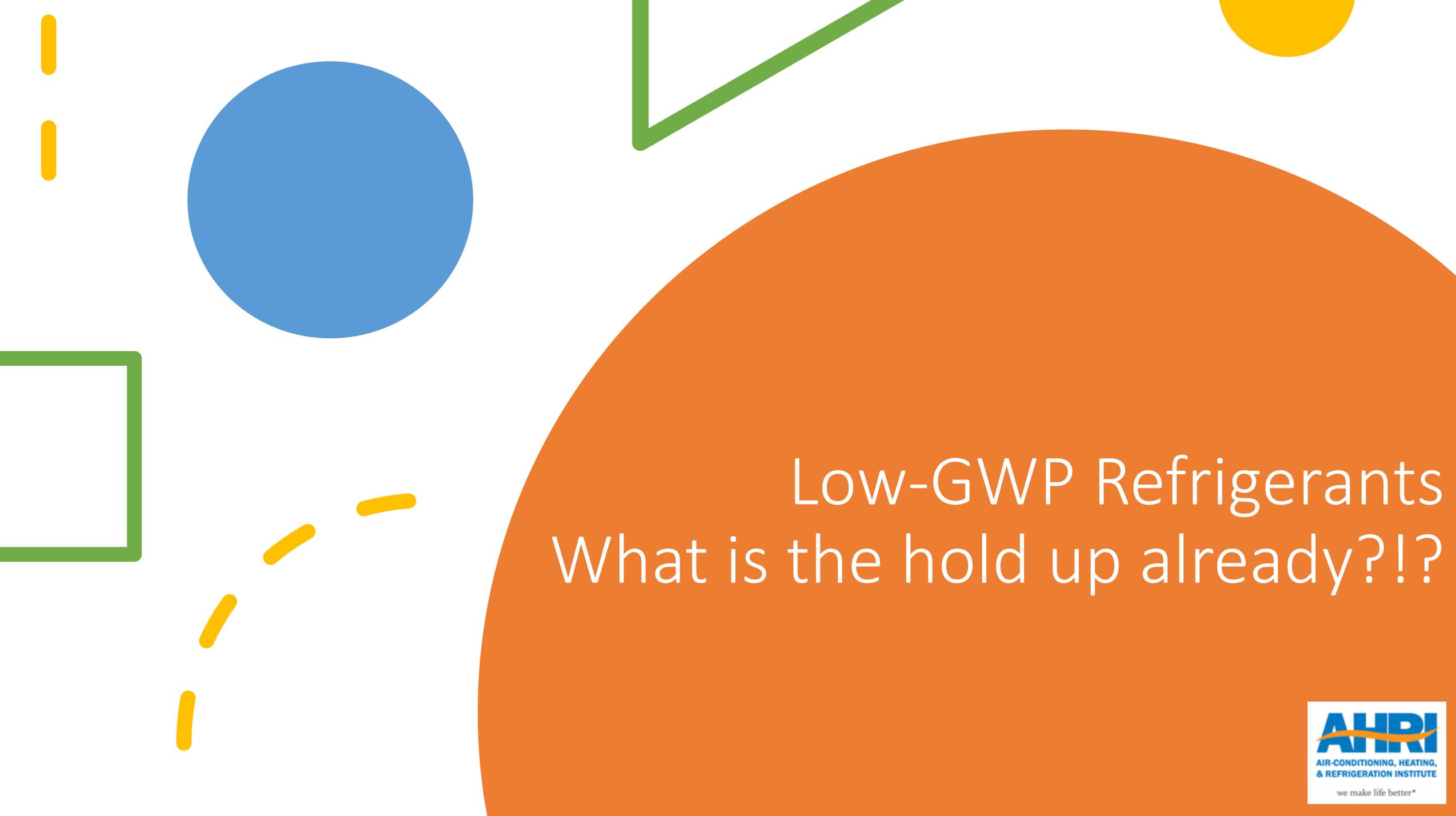
# AIM Act: The EPA “To Do List”

- **“Supply-side”** allocation rule (Oct 1, 2021)
- **“Demand-side”** sector transitions
  - AHRI – AC 2025 AC and HP; refrigeration
  - NRDC/IGSD – Reinstate SNAP Rules 20 & 21 under AIM
  - EIA – All California requirements
  - AHAM – AC, dehumidifiers
  - California and other states
- **Refrigerant management leak reduction, recovery and reclaim**

**Process allows for significant stakeholder input → Strong stakeholder support**



American Innovation and Manufacturing Act of 2020: “To Do List”

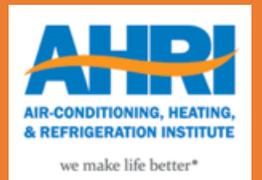


Low-GWP Refrigerants  
What is the hold up already?!?

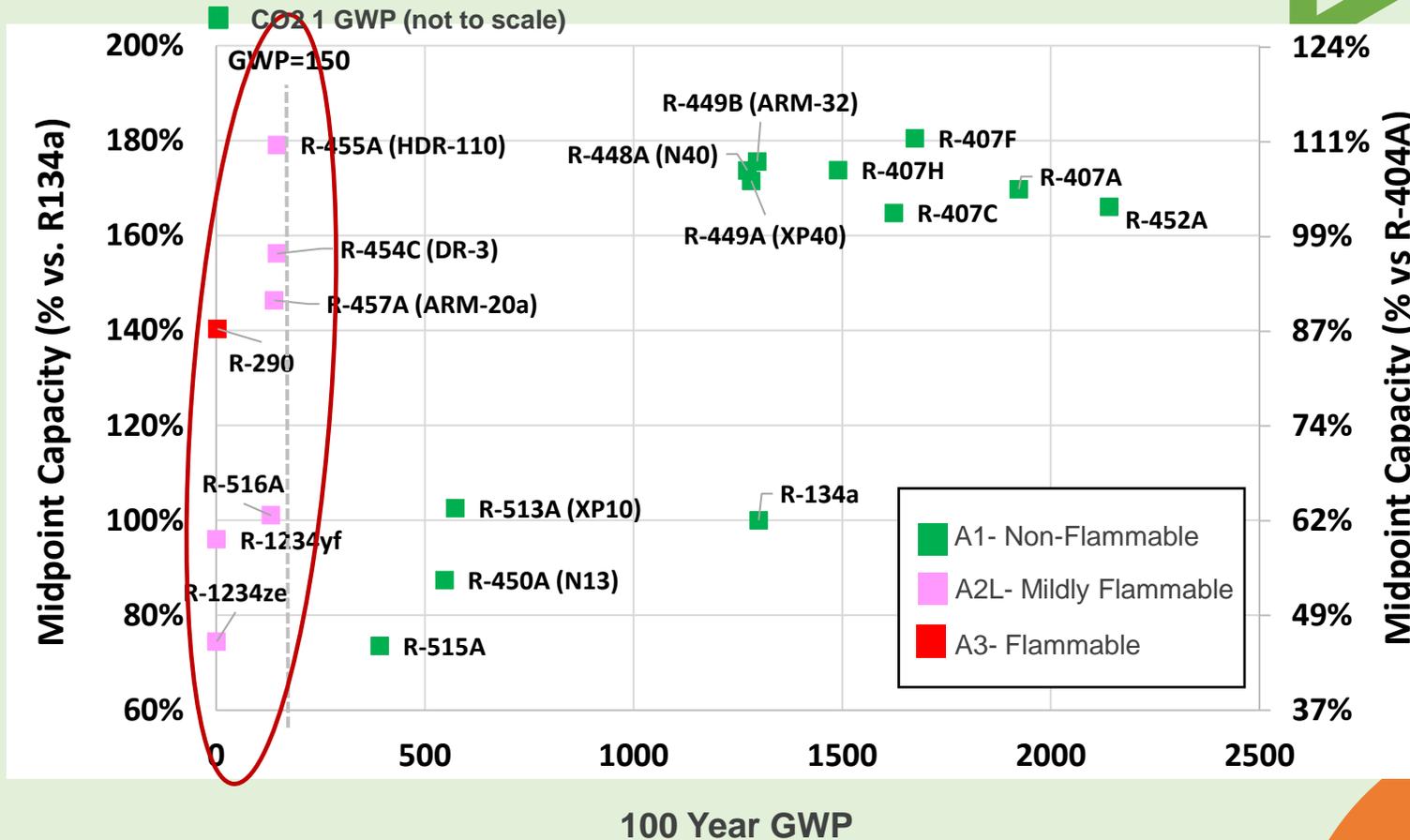


# Building Codes

Adoption of Safety Standards



# With Lower GWP comes Flammability



R-404A  
3,943 GWP  
(not to scale)

Chart courtesy of Emerson Climate Technologies



Examine all aspects of supply chain to ensure a safe transition to low GWP refrigerants

### Safe Recovery of Refrigerants

**These safety precautions apply to all refrigerants (A1 and A2L)**

- Maintaining vacuum on empty cylinders will help ensure refrigerant purity when filled with refrigerant.
- Properly label recovery cylinders by refrigerant type contained within cylinder
- Never tamper with relief valves
- Ensure that scales are accurate.
  - All refrigerant have different liquid densities
  - fill weights will vary by product
- Return full recovery cylinders to the proper source for reclamation

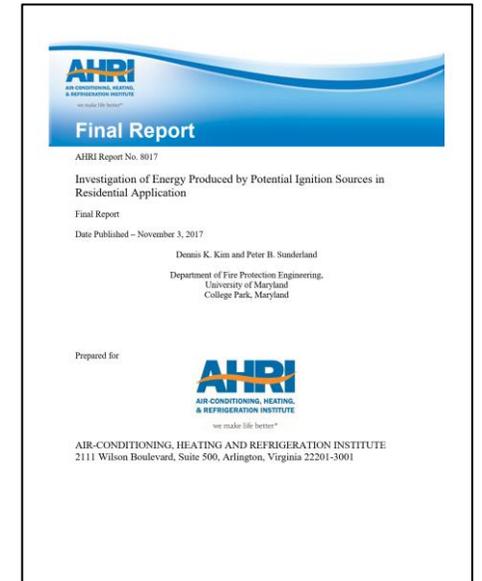
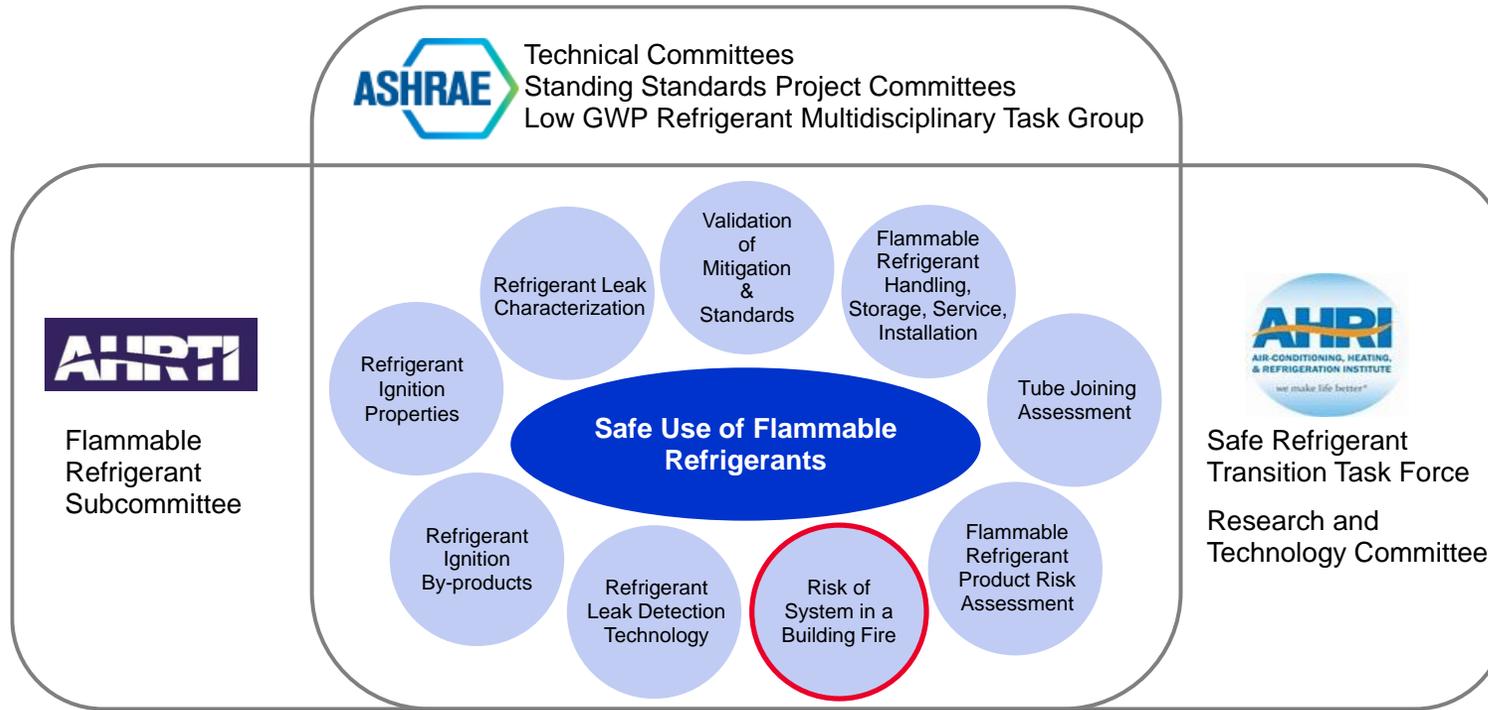


- ▶ Webinar 1 — Air Conditioning Applications
- ▶ Webinar 2 — Commercial Refrigeration Applications
- ▶ Webinar 3 — Understanding Refrigerant Sensors
- ▶ Webinar 4 — Predictive Tools for Refrigerant Behaviors
- ▶ Webinar 5 — Refrigerant Ignition in Open Flame/Hot Surfaces: Has Anything Fundamentally Changed?
- ▶ Webinar 6 — A2L Refrigerant Behavior in a Structure Fire
- ▶ Webinar 7 — Refrigerant Detection Systems 101
- ▶ Webinar 8 — Servicing A2L Refrigerant Systems
- ▶ Webinar 9 — A2L Refrigerants and Tactical Considerations for Firefighters
- ▶ Webinar 10 — Codes and Standards "Unlocked"

Webinar 11 - Joint Types and A2L Refrigerants



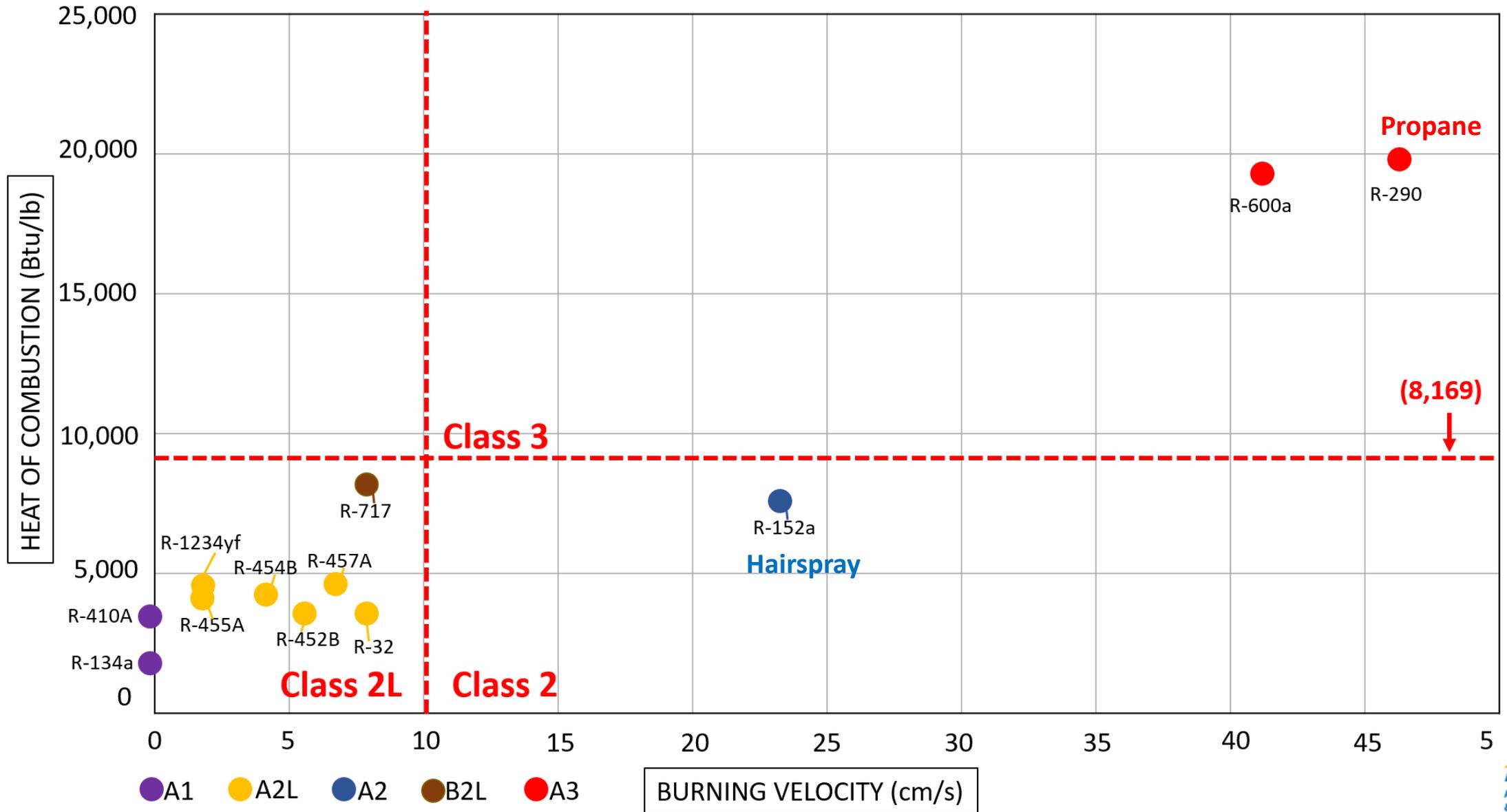
# > \$7 Million in Next Generation Refrigerant Research



## A2L refrigerants:

- Difficult to ignite,
- Slow flame speed
- Low heat of combustion

# Refrigerant Flammability Properties



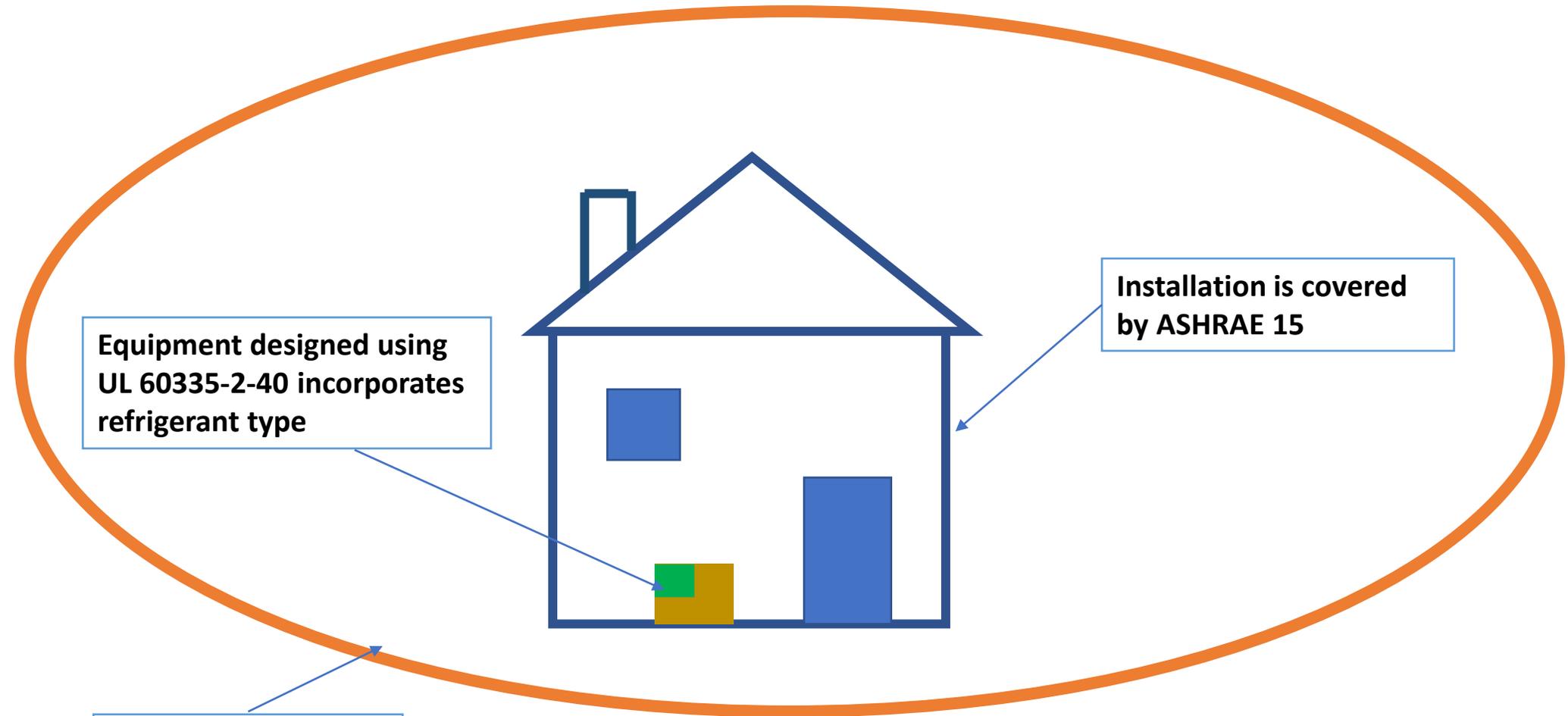
# AHRI / AHRTI Research

Refrigerant release + Competent ignition source = Ignition

Eliminate one (or both) to prevent ignition

Safety standards are developed to prevent the combination.

# Quick summary of how standards work together

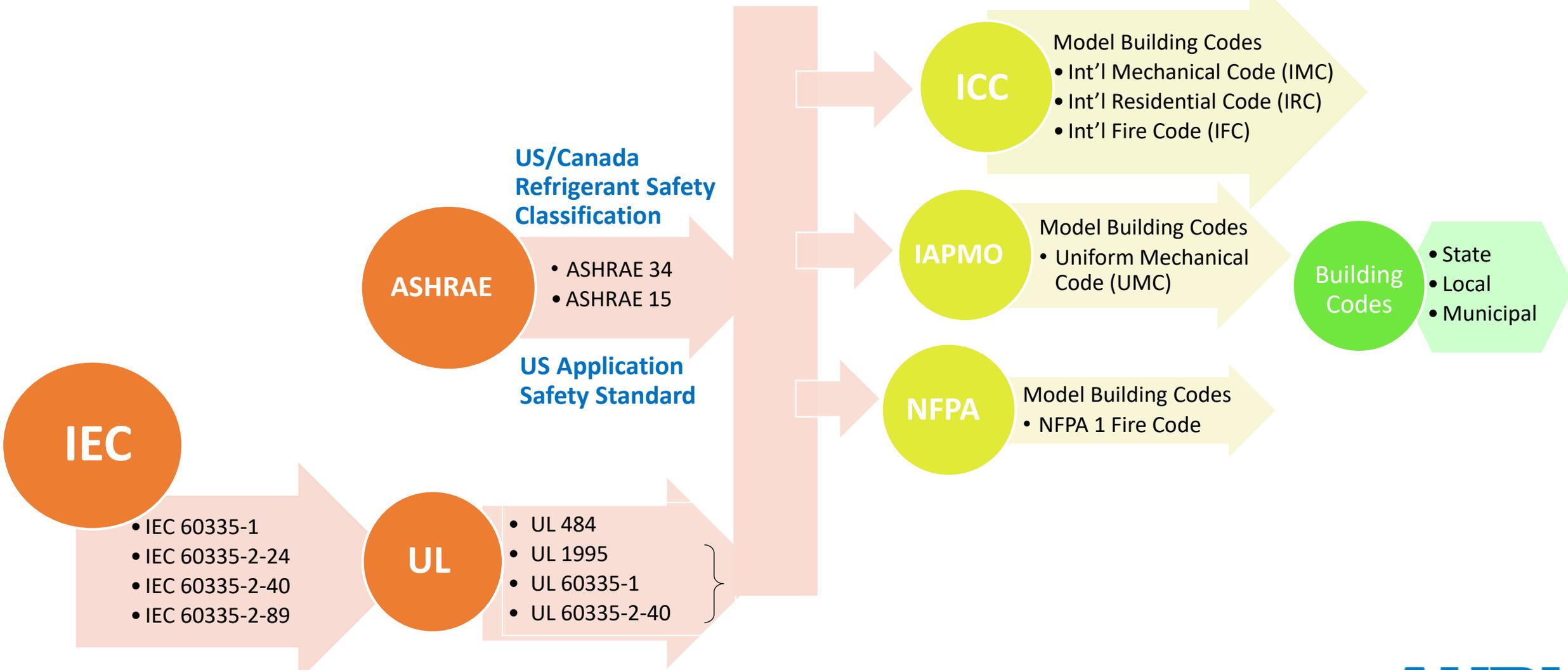


Equipment designed using UL 60335-2-40 incorporates refrigerant type

Installation is covered by ASHRAE 15

Building Codes IAPMO and ICC Codes

# Standards and Building Codes Relationships



**IEC**

- IEC 60335-1
- IEC 60335-2-24
- IEC 60335-2-40
- IEC 60335-2-89

**International  
Product Safety  
Standards**

**ASHRAE**

**US/Canada  
Refrigerant Safety  
Classification**

- ASHRAE 34
- ASHRAE 15

**US Application  
Safety Standard**

**UL**

- UL 484
- UL 1995
- UL 60335-1
- UL 60335-2-40

**US  
Product Safety  
Standards**

*National  
adaptation of  
IEC standards*

**ICC**

- Model Building Codes
- Int'l Mechanical Code (IMC)
  - Int'l Residential Code (IRC)
  - Int'l Fire Code (IFC)

**IAPMO**

- Model Building Codes
- Uniform Mechanical Code (UMC)

**NFPA**

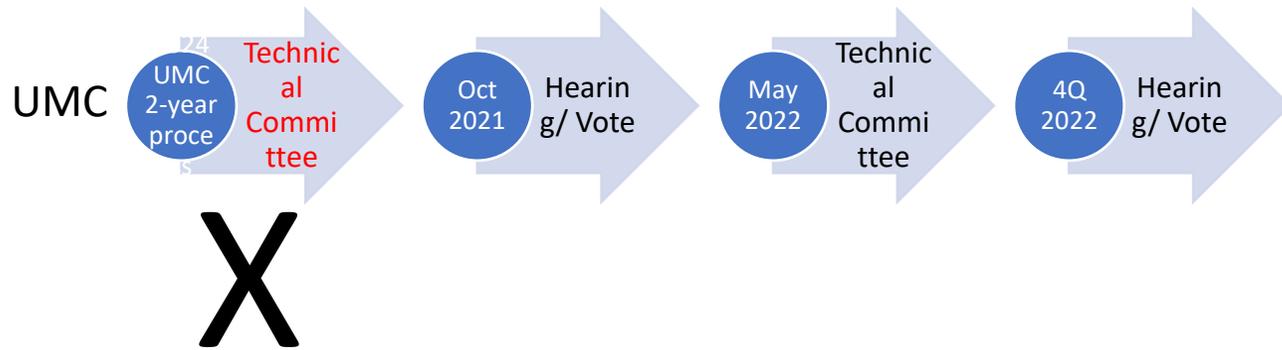
- Model Building Codes
- NFPA 1 Fire Code

**Building  
Codes**

- State
- Local
- Municipal

# California codes do not enable AC Low GWP Refrigerants

**FAIL**



**X**

**IMC PASS**



✓



CARB Deadline January 1, 2025

Industry needs at least 2 years to transition (normally has 6 years)

By statute, California adopts the Uniform Mechanical Code (UMC) which does not yet have a clear pathway for low GWP refrigerants.

International Mechanical Code (IMC) may have a clear path by year end

Invest in future success now!

# Toolbox

- Use low-GWP alternatives in new equipment
- Change architectures in stores
- Consider smaller charge sizes
- Retrofit existing equipment to lower GWP
- Reduce leaks
- Use recovered/reclaimed refrigerant

Please contact us with  
any HFC questions!

**Helen Walter-Terrinoni**

*VP Regulatory Affairs*

[Hwalter-terrinoni@ahrinet.org](mailto:Hwalter-terrinoni@ahrinet.org)

302-598-4608