

## **Comment 1 for Proposed Amendments to the Regulation for Small Containers of Automotive Refrigerant (smallcontainer2023) - 45 Day.**

First Name: Kristen  
Last Name: Taddonio  
Email Address: ktaddonio@igsd.org  
Affiliation: IGSD

Subject: Reclaimed refrigerant in MVAC small cans  
Comment:

Dear CARB,

I support the proposed rules to require reclaimed refrigerant in MVAC small cans that contain a refrigerant with a GWP over 150. Although more stringent policies would likely be easier to enforce and yield increased environmental benefits, such as Washington's prohibition on sale of small cans with refrigerant with a GWP >150, requiring reclaimed refrigerant is a next best option.

CARB may wish to consider, at the outset, ways to mitigate the potential for misconduct. Online sales and cross-state-border shipments could post a threat to successful implantation of the reclaimed refrigerant requirements. CARB should coordinate with its enforcement division and/or other authorities within California to develop a robust plan to minimize and mitigate cheating.

Additionally, CARB may wish to consider methods to assure that reclaimed refrigerant is not simply virgin refrigerant charged into and then immediately recovered from a large system for purposes of counting it as "reclaim." This scenario has been discussed in industry forums as a method to meet the demand for recovered refrigerant, and as a possible lucrative option if prices of reclaimed refrigerant happen to exceed the price of virgin refrigerant.

Best regards,

Kristen Taddonio  
Director of Climate Control  
IGSD

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2023-07-24 09:22:37

No Duplicates.

**Comment 2 for Proposed Amendments to the Regulation for Small Containers of Automotive Refrigerant (smallcontainer2023) - 45 Day.**

First Name: Christina

Last Name: Starr

Email Address: cstarr@eia-global.org

Affiliation: Environmental Investigation Agency

Subject: EIA Comments on CARB Proposal to Amend Regulation for Small Cans of Automotive Refrigerant

Comment:

Please find comments attached on behalf of the Environmental Investigation Agency.

Attachment: 'www.arb.ca.gov/lists/com-attach/3-smallcontainer2023-Wj8HaARkV1sLbglm.pdf'

Original File Name: EIA Comments\_Small Cans Reclaim Proposal (1).pdf

Date and Time Comment Was Submitted: 2023-08-18 11:41:19

No Duplicates.

**Comment 3 for Proposed Amendments to the Regulation for Small Containers of Automotive Refrigerant (smallcontainer2023) - 45 Day.**

First Name: Daniel  
Last Name: Chandler  
Email Address: dwchndl@gmail.com  
Affiliation: 350 Humboldt

Subject: Comments on proposed small can regulations  
Comment:

Please see attached comments.

Attachment: 'www.arb.ca.gov/lists/com-attach/4-smallcontainer2023-UTJXPIA8VWtWNV18.pdf'

Original File Name: Comments on small cans regs \_350 Humboldt\_CAC 8\_20\_23.pdf

Date and Time Comment Was Submitted: 2023-08-20 16:44:27

No Duplicates.

**Comment 4 for Proposed Amendments to the Regulation for Small Containers of Automotive Refrigerant (smallcontainer2023) - 45 Day.**

First Name: Nicholas

Last Name: Georges

Email Address: ngeorges@thehcpa.org

Affiliation: HCPA

Subject: Comments on Small Containers of Automotive Refrigerant Proposal

Comment:

The Household & Commercial Products Association appreciates the opportunity to provide the attached comments.

Attachment: 'www.arb.ca.gov/lists/com-attach/5-smallcontainer2023-BW0GY1cmBDYBWAfi.pdf'

Original File Name: HCPA Comments on Proposed Amendments to the Regulation for Small Containers of Automotive Refrigerant.pdf

Date and Time Comment Was Submitted: 2023-08-21 13:21:56

No Duplicates.

**Comment 5 for Proposed Amendments to the Regulation for Small Containers of Automotive Refrigerant (smallcontainer2023) - 45 Day.**

First Name: mary

Last Name: metzner

Email Address: naa@nationalaerosol.com

Affiliation: National Aerosol Association

Subject: Comments on smallcontainer2023; Proposed Amendments to the Regulation for Small Containers

Comment:

Submission of Comments on small container 2023. Please see attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/6-smallcontainer2023-AG5RNgbBwsLfgJv.pdf'

Original File Name: NAA small containers refrigerant comment August 2023.pdf

Date and Time Comment Was Submitted: 2023-08-21 14:48:53

No Duplicates.

**Comment 1 for Proposed Amendments to the Regulation for Small Containers of Automotive Refrigerant (smallcontainer2023). (At Hearing)**

First Name: Doug

Last Name: Kobold

Email Address: Doug@calpsc.org

Affiliation: California Product Stewardship Council

Subject: 23-9-3: Public Hearing to Consider Proposed Amendments to the Regulation for Small Containers

Comment:

Please find the attached comment letter for today's agenda item.

Attachment: [www.arb.ca.gov/lists/com-attach/7-smallcontainer2023-WzgAZwd0WGkBWAd0.pdf](http://www.arb.ca.gov/lists/com-attach/7-smallcontainer2023-WzgAZwd0WGkBWAd0.pdf)

Original File Name: CARB Small Can Refrigerant Comment Letter 2023-10-26.pdf

Date and Time Comment Was Submitted: 2023-10-26 09:57:35

No Duplicates.