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August 18, 2021

Elizabeth Scheele  
Glenn Gallagher  
F-gas Reduction Strategy Section  
California Air Resources Board  
1001 I Street, Sacramento, California 95814

**Re: Proposed Amendments to California's HFC Regulation**

Dear Ms. Scheele and Mr. Gallagher:

Rheem Manufacturing Company (Rheem) appreciates the opportunity to provide feedback on the *Proposed Amendments to the Prohibitions on Use of Certain Hydrofluorocarbons (HFCs) in Stationary Refrigeration, Chillers, Aerosols-Propellants, and Foam End-Uses Regulation*, published on August 3, 2021 for 15-day comment.

Rheem is headquartered in Atlanta, Georgia and operates multiple facilities for the manufacture or support of one of the most comprehensive lines in the U.S. of residential and commercial air conditioners and heat pumps with nationwide distribution through various channels. Rheem manufactures heat pump water heaters and heat pump pool heaters, with many under the Raypak® brand, through its Water Heating Division. Rheem also designs, manufactures, and markets energy-efficient commercial and industrial refrigeration equipment and system solutions via its Heat Transfer Products Group (HTPG).

We offer our continued thanks and appreciation for the multiple opportunities to give manufacturer feedback on this journey to a final rule on HFCs. As we near the conclusion of this collaborative process, we offer the following comments in an effort to further refine and clarify the language:

- **Rheem strongly recommends that CARB allow manufacturers to begin fulfilling their 2023-2024 obligation to use reclaimed refrigerant as soon as possible (i.e. prior to January 1, 2023) and explicitly state such in the regulatory text.** The regulatory text is unclear as to the start date of the manufacturer obligation for reclaim use to account for AC installations in 2023 and 2024. Considering the mutual desire of both CARB and manufacturers to spur increased reclamation, coupled with the fact that the obligation can be calculated and reported immediately using the proposed baseline years of 2018 and 2019, we recommend that manufacturers be allowed to begin fulfilling their reclaim offset obligation as soon as possible.
- **Recommend CARB allow for Optional Early Action Credit for Refrigerant with a GWP less than 750 used in new equipment entered into commerce in any state prior to January 1, 2025.** With federal transition under the AIM Act likely to occur on January 1, 2025, CARB has the unique opportunity to incentivize nationwide introduction of low-GWP AC units in advance of a national compliance date. In states where building codes allow it, such as Florida, Washington, and Texas, installation is possible as early as 2023, with significant environmental benefit if early action is achieved.



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- **The recordkeeping requirement of *number and type of units with reclaimed refrigerant sold, even estimated, still represents an overly burdensome compliance requirement.*** As refrigerant is sourced by manufacturers in bulk, added to bulk storage tanks and used in large manufacturing lines, it is challenging-to-impossible to track individual units containing reclaim. Compliance can be easily ensured by tracking OEM acquisition of reclaimed refrigerant, and any further reporting of reclaim destination does little to verify program compliance or effectiveness.
- **Remove the requirement that manufacturers attest that *the certified reclaimed refrigerant is not being purchased, used, or counted to comply with any other government requirement(s), private or voluntary program(s), or any other credit(s) or incentive(s).*** As local and federal programs evolve to promote responsible refrigerant handling and recovery, with many types of incentives, rebates, and other market drivers possible, manufacturers should not be limited in participating where beneficial to market adoption.

Rheem recommends that CARB continue to improve the text with these logical recommendations in order to bring about a successful program with maximum benefit. Thank you again for your consideration of industry feedback. If you have any questions regarding this submission, please do not hesitate to contact me at [allison.skidd@rheem.com](mailto:allison.skidd@rheem.com).

Sincerely,

A handwritten signature in black ink that reads "Allison J. Skidd".

Allison J. Skidd  
Sr. Manager, Global Regulatory Affairs – Air  
Rheem Manufacturing Company

CC: Karen Meyers

