HARDI HEATING AIR-CONDITIONING REFRIGERATION DISTRIBUTORS INTERNATIONAL

445 Hutchinson Avenue
Suite 550
Columbus, OH 43235

July 27, 2020

Ms. Cynthia Newberg
Director Stratospheric Protection Division
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Submitted electronically

RE: Heating, Air-conditioning, & Refrigeration Distributors International comments on the Listing of Substitutes Under the Significant New Alternatives Policy Program (EPA-HQ-OAR-2019-0698)

Dear Ms. Newburg,

On behalf of Heating, Air-conditioning & Refrigeration Distributors International (HARDI) I write to offer comments on the Stratospheric Protection Division listing of substitutes under the Significant New Alternatives Policy (SNAP) Program.

HARDI is a trade association comprised of nearly 1,000 member companies, nearly 500 of which are U.S.–based wholesale distribution companies. More than 80 percent of HARDI's distributor members are classified as small businesses that collectively employ over 35,000 U.S. workers, representing more than $35 billion in annual sales and an estimated 80 percent of the U.S. wholesale distribution market of heating, ventilation, air-conditioning and refrigeration (HVACR) equipment, supplies, and controls.

HARDI supports phasing down the use of hydrofluorocarbons (HFC) and encourages our members and their customers to take a proactive approach in utilizing HFC replacement products as they become available on the market and meet local building and mechanical codes. A market-based approach, based on past transitions, allows our members to sell new equipment

utilizing replacement refrigerants while existing equipment can be maintained with legacy refrigerants. The SNAP program has successfully allowed these transitions to occur and is a model for this future transition. HARDI believes federal action is the most effective way to reduce HFCs and currently supports the American Innovation and Manufacturing Act (S. 2754) to ensure a smooth transition.

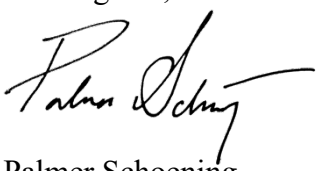
Approved alternatives allow for a market-based phase-down

The Kigali Amendment to the Montreal Protocol includes an internationally agreed upon market-based phase-down of HFCs. Phasing down the production of HFCs will require available alternatives such as the refrigerants in the proposed listing: R-448A, R-449A, R-449B, R-32, R-452B, R-454A, R-454B, R-454C, and R-457A. Under the proposed listing, these refrigerants will serve as replacements to existing refrigerants used in stationary air-conditioning and commercial refrigeration.

HARDI supports the overall effort to phase down the use of HFC refrigerants. The listing of these refrigerants is one part of a larger process in the industry's effort to phase down older refrigerants. HARDI is actively working with the rest of the HVACR industry to ensure a smooth and safe transition takes place. In addition to these listings, the industry is supporting updates to the building and mechanical codes to allow new equipment to use new refrigerants, the development of training to allow contractors to install newly designed equipment, and updates to fire codes and transportation regulations to allow the storage and distribution of HVACR equipment utilizing these refrigerants.

HARDI appreciates the opportunity to comment on the proposed listing of new refrigerants and supports the listing of these refrigerants as part of the larger process of phasing down existing HFC refrigerants.

Best regards,



Palmer Schoening
Vice President of Government Affairs
Heating, Air-conditioning, & Refrigeration Distributors International