

**Concept Note: Public Meeting on Clean Air Act Section 608 and
Substitutes for Ozone-Depleting Substances
Twelve & K Hotel, 1201 K Street, NW, Washington, DC
November 12, 2014, 9 a.m. ET**

Background: Climate Action Plan and Hydrofluorocarbons

In June 2013, President Obama announced the Climate Action Plan (CAP), including a broad set of initial steps designed to slow the effects of climate change. Among the many actions called for, the President directed the United States to lead through both international diplomacy and domestic action to address hydrofluorocarbons (HFCs)¹. In the United States, emissions of HFCs are expected to double from current levels of 1.5 percent of total annual greenhouse gas emissions to 3 percent by 2020 and nearly triple by 2030.² HFCs are rapidly accumulating in the atmosphere. For example, the atmospheric concentration of HFC-134a, the most abundant HFC, has increased by about 10 percent per year from 2006 to 2012, and the concentrations of HFC-143a and HFC-125 have risen over 13 percent and 16 percent per year from 2007-2011, respectively.^{3, 4}

Current EPA Efforts to Reduce HFC Emissions

Since the announcement of the Climate Action Plan, EPA has taken a number of steps designed to curb emissions of HFCs. Specifically, and consistent with the direction announced in the President's CAP, EPA has used its authority through the Significant New Alternatives Policy (SNAP) Program to encourage private sector investment in climate-friendly chemicals for use in specific end uses. EPA has also proposed the prohibition of certain uses of the most climate-damaging chemicals. As part of the CAP, the President directed the Federal government to lead by example in reducing emissions of HFCs through the purchase of lower-global warming potential (GWP) alternatives to HFCs whenever feasible and transition over time to equipment that uses safer and more sustainable alternatives. The change to federal procurement practices is led by the Office of the Federal Environmental Executive (OFEE), and EPA has been working with OFEE and other parts of the Federal government to change existing procurement regulations, improve agencies' annual GHG reporting of HFCs and practices to reduce emissions, and provide current information on low-GWP alternatives listed by SNAP. These activities are still underway.

Additional Efforts to Reduce HFC Emissions and Public Meeting

To highlight the broad scope of efforts to address HFCs, the White House announced new private sector commitments and executive actions to reduce HFC emissions on September 16, 2014. During the related roundtable discussion, participants discussed – and EPA acknowledged – that refrigerant management is an important way to reduce climate-damaging emissions from equipment used for air-conditioning and refrigeration, and EPA committed to further engage with stakeholders on this issue.

¹ HFCs were introduced as alternatives to ozone-depleting substances and are commonly used as refrigerants, foam-blowing agents, solvents, and aerosol propellants. They do not significantly deplete the stratospheric ozone layer, but are greenhouse gases that contribute to climate change. Some HFCs have a global warming potential thousands of times greater than carbon dioxide.

² <http://www.whitehouse.gov/share/climate-action-plan>

³ Montzka, S.A.: HFCs in the Atmosphere: Concentrations, Emissions and Impacts, ASHRAE/NIST Conference 2012

⁴ NOAA data at <ftp://ftp.cmdl.noaa.gov/hats/hfcs/>

As a next step, the agency is holding a public meeting on November 12, 2014 to discuss opportunities to achieve further HFC emissions reductions through enhanced efforts in the area of refrigerant management. The primary goal of the meeting is to hear individual suggestions from members of the public on potential ways to reduce emissions of both high-GWP substitute refrigerants, including HFCs, as well as ozone-depleting refrigerants, during the service, maintenance, repair and disposal of air conditioning and refrigeration equipment.

As noted at the September 16 event, the Alliance for Responsible Atmospheric Policy has petitioned EPA to create consistent refrigerant management regulations by applying the same rules that already exist for ozone-depleting refrigerants to HFCs.⁵ Accordingly, at the public meeting, EPA will seek individual ideas and feedback from members of the public on the possible expansion of existing refrigerant management rules to HFCs. We will seek feedback on which components of the existing Clean Air Act Section 608 refrigerant management program work well, and which components could be improved. We will also seek input on whether existing regulatory requirements are appropriate for HFCs.

To help facilitate a more informed discussion, background information on the existing refrigerant management program is available online at www.epa.gov/ozone/title6/608/. In addition, we have developed a list of questions that we are considering as we assess potential actions to reduce emissions of ozone-depleting refrigerants, HFCs, and other substitutes for ozone-depleting refrigerants:

- Should EPA extend the Section 608 regulations to HFCs?
- Are some components of Section 608 more relevant to HFCs than others?
- Should EPA consider including other climate-damaging substitutes within any Section 608 extension (e.g., PFCs)? For all components or only some components?
- Would it be reasonable to apply the 608 leak rates to HFCs?
- Are there other ways to incentivize lower leak rates?
- Would it be reasonable to apply the existing standards for recovery equipment and reclaimed ozone-depleting refrigerants to HFCs?
- How can the Section 608 technician certification program be improved?
- Is there a better way to ensure refrigerant is recovered from small appliances at end-of-life?
- Should EPA consider using this effort as an opportunity to simplify/improve/update the Section 608 rules? If so, what components might be simplified/improved/updated?

Participation

EPA recognizes that a diverse set of stakeholders could be affected by any change to the Section 608 regulations. We appreciate the importance of stakeholder views, and a primary purpose of this concept note and meeting is to share our current approach and to enable stakeholders to provide focused input on the Section 608 refrigerant management program. We encourage anyone who is interested to provide

⁵ A copy of the petition is available at www2.epa.gov/sites/production/files/2014-05/documents/alliance-petition-31jan2014-v2-2.pdf

individual advice and suggestions during the meeting. Toward that end, we encourage stakeholders to share this note with others who may be interested in this opportunity. A copy of this concept note will be available at www.epa.gov/ozone/title6/608/ and www.regulations.gov (search for EPA-HQ-OAR-2014-0786).

We ask that you please RSVP to Altan Gabbay at gabbay.altan@epa.gov by November 5, 2014, if you plan on attending the meeting. The meeting will be held at 9 a.m. ET on November 12, 2014 at Twelve & K Hotel, 1201 K Street, NW, Washington, DC 20005.