



# Small Containers of Automotive Refrigerant

Workshop for Proposed Amendments  
January 20, 2022

# Workshop Agenda

- Introduction
- Proposed small can amendment
- Q and A, open discussion
- Next Steps

# Providing Comments or Questions

- You can provide comments and questions throughout the workshop
  - Type in comments any time in the Q&A
  - Please reference the page number of slide relating to your question if applicable
  - If you have any technical issues, staff will be available to assist you
- We will respond during the Q&A session at the end of the presentation
- For verbal comment or question, you may raise your hand to be added to the speaking queue
  - If you're on the phone, press #2 to raise your hand

# CARB Team Today

- Van Tsan, Staff lead for Small Can Regulation
- Dongmin Luo, Manager
- Alex Wang, Senior Attorney
- Matthew Christen, CEQA
- Michael FitzGibbon, Branch Chief
- Elizabeth Scheehle, Research Division Chief

# Presentation Outline

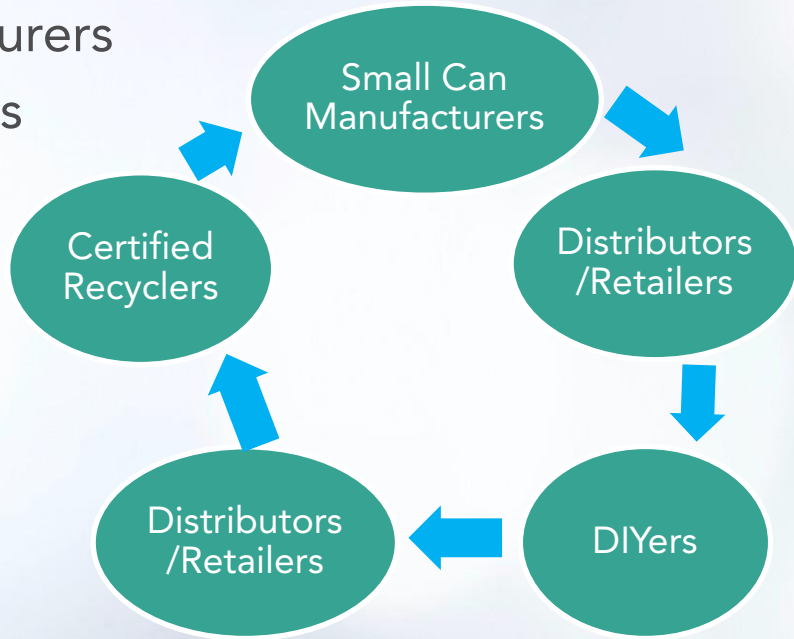
- Small Can Regulation overview
- Who is affected by the regulation?
- Current status of Deposit and Recycling program
- Amendment proposal
- Benefits of amendment

# Small Can Regulation Overview

- Effective January 2011; amended in April 2016
- Applies to containers holding between two ounces and two pounds of a high GWP (150 or greater) refrigerant
- Requirements:
  - Use of a self-sealing valve on the container
  - Deposit (\$10) and Recycling Program for small containers
  - Can certification and labeling requirements
  - Enhanced Education Program (EEP) that emphasizes best practices for vehicle air conditioning recharging

# Who is affected by the regulation?

- Small Can Manufacturers
- Distributors/Retailers
- Do-It-Yourselfers (DIYers)
- Certified Recyclers



# Enhanced Education Program

- Funded by unclaimed deposits
  - \$5.3 million/year total
  - \$2.8 million/year from Disadvantaged Communities (DAC)
- DAC responsible for ~55% of all sales or returns
- Paid media campaign 2017-2020 to increase return rate



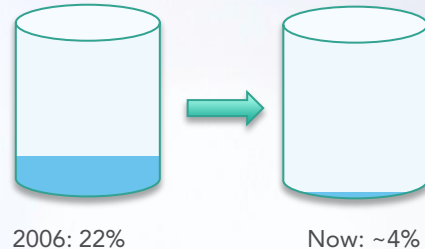


# Total Return Rate



# Deposit and Recycling Program

- Initial study in 2006 estimated a 22% can heel after use
- Current data shows less than 4% can heel after use (~16,000 MTCO<sub>2</sub>e/year)
- Majority of emission reductions are from the self-sealing valve (~200,000 MTCO<sub>2</sub>e/year)



# Amendment Proposal

- Keep the self-sealing valve
- Remove the Deposit and Recycling program
- Manufacturers are to use reclaimed refrigerants in small cans
- Other minor revisions for rule clarity

# Reclaimed Refrigerant Proposal

- Manufacturers to use reclaimed refrigerant in small cans of automotive refrigerant when selling in CA
  - CARB introduced a similar requirement in the Stationary Refrigeration and Air Conditioning Regulation that became effective January 1, 2022
  - The reclaimed HFC-134a must be obtained from a U.S. EPA certified reclaimer within the US
  - Nationwide, there is sufficient reclaimed HFC-134a to meet this proposed requirement
- CARB is requesting feedback on this proposal

# Environmental Analysis

- Environmental Analysis (EA) to:
  - Analyze potentially significant adverse impacts caused by reasonably foreseeable actions
  - Meet requirements of CARB's certified program under CEQA
- The CEQA Environmental Checklist (CEQA Guidelines Appendix G) is used to evaluate potential impacts
- The EA will be an appendix to the Staff Report

# Environmental Analysis to Include

- Description of reasonably foreseeable actions taken in response to the proposed regulation
- Programmatic level analysis of potential adverse impacts caused by reasonably foreseeable actions
- Beneficial impacts
- Feasible mitigation measures to reduce/avoid significant impacts
- Alternatives analysis
- Input invited at this early stage on appropriate scope and content of the EA
- Draft EA will be released for 45 day public comment period

# Amendment Proposal Benefits

- Alignment with the U.S. EPA National program.
- Save DIYers money
  - No upfront \$10 can deposit cost
  - \$5.5 million per year from unclaimed deposits
  - Fuel cost and time savings for not returning cans
- Benefits for lower income do-it-yourselfers in DAC

# Next Steps – Preliminary Timeline

## Small Can Regulation Amendments Rulemaking

Regulation Item	Tentative Date
Public workshop(s) and Stakeholder meetings	January 2022+
Staff Report (ISOR) 45-Day public comment opens	Late 2022
Board Meeting	Late 2022



# Questions

Van Tsan

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Website:

<https://ww2.arb.ca.gov/our-work/programs/small-containers-automotive-refrigerant>

