

## **Comment 1 for High Global Warming Potential Refrigerants for Stationary Sources (gwprmp09) - 45 Day.**

First Name: Michael

Last Name: Bailey

Email Address: [michaelebailey@cox.net](mailto:michaelebailey@cox.net)

Affiliation: People First, California, Orange County

Subject: Draft Regulation for High Potential GHG Refrigerants

Comment:

This is a regulation especially needed for large stationary commercial refrigeration plants, like supermarket freezers and refrigerated sections. Today, it is too easy, probably because of cost pressures, to continue to use leaky, poorly designed and/or maintained refrigerant systems. 29% of commercial refrigeration systems in the South Coast Air Quality Management District leak yearly and lose on average 65% of their charge annually. This is a very high level of potent ghg and ozone depleting gases going into the atmosphere every year just in the South Coast Air Quality Management District. If this same level of refrigerant leakage holds across the state, it would represent a severe environmental and health problem that must be addressed as soon as possible. The U.S. EPA's GreenChill Program has proven over several years that it cost markets and other stores much less to operate a clean and efficient system than a polluting one, even under the current cost pressures. I think that something that will go along way in winning support for the new refrigerant systems is an incentive program similar to some now in use by CalEPA and USEPA where a portion of the cost of buying and installing the new systems is paid either by the state, the federal government or some from each so small family owned markets don't have the full costs to pay for out of pocket. Thank you. Michael E. Bailey.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2009-11-29 21:36:08

No Duplicates.

**Comment 2 for High Global Warming Potential Refrigerants for Stationary Sources (gwprmp09) - 45 Day.**

First Name: Tim

Last Name: Frazee

Email Address: tfraz38@yahoo.com

Affiliation:

Subject: Proposed Regulation Management of High GWP Refrigerants

Comment:

To whom it may concern:

I am in support of the proposed new regulation. The new regulation reenforces the intent of the existing Federal regulations to prohibit individual persons and business entities from releasing GWP refrigerants.

I strongly feel that enforcement actions, by both Federal and State entities, are needed. As a result of my personal experiences, I commonly find that many persons and businesses commonly vent refrigerant instead of responsibly recovering it into cylinders for recycling or disposal. The potential to fund staffing for auditing and enforcement through fines/penalties is extremely viable.

Thanks for the opportunity to provide these comments, and feel free to contact me if I can help further.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2009-12-02 10:21:41

No Duplicates.

**Comment 3 for High Global Warming Potential Refrigerants for Stationary Sources (gwprmp09) - 45 Day.**

First Name: Timothy  
Last Name: OConnor  
Email Address: toconnor@edf.org  
Affiliation: Environmental Defense Fund

Subject: Comments on High-GWP RMP  
Comment:

See attached letter

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/gwprmp09/3-edf\_letter\_on\_rmp\_\_dec\_1\_\_2009\_.pdf'

Original File Name: EDF letter on RMP (Dec 1, 2009).pdf

Date and Time Comment Was Submitted: 2009-12-03 16:33:44

No Duplicates.

**Comment 4 for High Global Warming Potential Refrigerants for Stationary Sources (gwprmp09) - 45 Day.**

First Name: Timothy

Last Name: OConnor

Email Address: toconnor@edf.org

Affiliation: NGO Group Representative

Subject: Comments from NGO's on High-GWP reg

Comment:

Please see attached

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/gwprmp09/4-comment\_letter\_on\_carb\_rmp.pdf'

Original File Name: Comment letter on CARB RMP.pdf

Date and Time Comment Was Submitted: 2009-12-07 10:53:31

No Duplicates.

**Comment 5 for High Global Warming Potential Refrigerants for Stationary Sources (gwprmp09) - 45 Day.**

First Name: Catherine  
Last Name: Reheis-Boyd  
Email Address: joey@wspa.org  
Affiliation:

Subject: WSPA Proposed Regulation for the Management of High Global Warming Potential  
Comment:

Please see attached WSPA comment letter on Proposed Regulation for the Management of High Global Warming Potential.

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/gwprmp09/6-wspa\\_refrigerants\\_letter.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/gwprmp09/6-wspa_refrigerants_letter.pdf)'

Original File Name: WSPA Refrigerants Letter.pdf

Date and Time Comment Was Submitted: 2009-12-08 09:34:15

No Duplicates.

**Comment 1 for High Global Warming Potential Refrigerants for Stationary Sources (gwprmp09). (At Hearing)**

First Name: Ed

Last Name: Estberg

Email Address: Non-web submitted comment

Affiliation:

Subject: High Global Warming Potential Refrigerant

Comment:

please see attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/gwprmp09/7-ed.pdf>

Original File Name: Ed.pdf

Date and Time Comment Was Submitted: 2009-12-10 16:08:42

No Duplicates.

**Comment 2 for High Global Warming Potential Refrigerants for Stationary Sources (gwprmp09). (At Hearing)**

First Name: Marc G.

Last Name: Minneci

Email Address: Non-web submitted comment

Affiliation:

Subject: Edwards Air Force Base

Comment:

please see attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/gwprmp09/8-marc.doc>

Original File Name: Marc.doc

Date and Time Comment Was Submitted: 2009-12-22 10:06:14

No Duplicates.

## **Comment 1 for High Global Warming Potential Refrigerants for Stationary Sources (gwprmp09) - 15-1.**

First Name: Tim

Last Name: Frazee

Email Address: tfrazee@raprec.com

Affiliation: Rapid Recovery

Subject: Enforcement of Proposed Regulation

Comment:

This regulation is a small step in the correct direction. The one component missing from this and all other refrigerant regulations is enforcement. Based upon my observations as someone intimately involved with refrigerant management on a daily basis, the vast majority of appliance owners and contractors do not take the existing, or this proposed regulation too seriously as they know that the Feds, and local government agencies, do not actively audit records, investigate reports of purposeful venting, or for all intents and purposes, enforce the law.

The phasing of the regulation, based upon the size of the refrigerant charge, does soften any financial blow and allow businesses time to plan for changes in their operations. This is a good and generous allowance.

One question I have relates to how the fee revenue is to be spent.

I would propose that it be used to hire audits/investigators for enforcement purposes, which would add some sorely needed teeth to the regulation.

Thanks,

Tim Frazee  
Rapid Recovery

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-03-30 14:48:43

No Duplicates.

**Comment 2 for High Global Warming Potential Refrigerants for Stationary Sources (gwprmp09) - 15-1.**

First Name: Sam

Last Name: Cantrell

Email Address: scantrell@raleys.com

Affiliation: Raley's

Subject: Registration Fees

Comment:

It is unclear if the registration fee for facilities with multiple systems will be assessed on a 'per-system' basis, or a 'per-facility' basis. In other words, will a building with 4 systems that each have a 1000 lb. charge cost \$170 to register the facility, or \$680 (4 systems) to register 4 systems?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-04-01 12:09:43

No Duplicates.

**Comment 3 for High Global Warming Potential Refrigerants for Stationary Sources (gwprmp09) - 15-1.**

First Name: Dipak

Last Name: Patel

Email Address: dipak.patel@LADWP.com

Affiliation:

Subject: Comments -Proposed Reg. for the Mngt. of HGW Potential Refrigerants for Stationary Sources

Comment:

A comment letter is attached/up-loaded.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/gwprmp09/11-comment\\_letter\\_-\\_arb.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/gwprmp09/11-comment_letter_-_arb.pdf)

Original File Name: Comment Letter - ARB.pdf

Date and Time Comment Was Submitted: 2010-04-01 14:59:42

No Duplicates.