

## **Comment 1 for High-Global Warming Potential Refrigerant Emissions Reductions Regulation (casnap) - 45 Day.**

First Name: Harshad

Last Name: Inamdar

Email Address: Harshad.Inamdar@rheem.com

Affiliation: Rheem Manufacturing

Subject: Recordkeeping requirements on OEM

Comment:

As an OEM, the vast majority of our sales in refrigeration equipment aimed at the end-uses regulated by this proposed rulemaking are direct to a Walk-in Box Manufacturer or a wholesaler.

The OEM typically has no visibility as to the installation location, the end use application or whether the equipment will be used as a service replacement or in a new installation. Since we are not involved in the installation we also have no knowledge of the amount or type of refrigerant used.

cf.

Section 95375. Requirements

(c) Disclosure and Recordkeeping for Refrigeration End-Use Categories.

(2) Recordkeeping.

(F) The refrigerant and full charge capacity of the equipment.

---The requirement on the OEM to record and maintain current records about the type of refrigerant charged to the system and the full quantity of respective refrigerant charge in the equipment may not be possible to fulfil.

Could CARB issue clarification about these recordkeeping requirements?

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2018-03-02 13:52:24

No Duplicates.

**Comment 2 for High-Global Warming Potential Refrigerant Emissions Reductions Regulation (casnap) - 45 Day.**

First Name: Garrett

Last Name: McGuire

Email Address: gmcguire@ahrinet.org

Affiliation:

Subject: AHRI Comments

Comment:

AHRI's comments for the Proposed Regulation for Prohibitions on Use of Certain Hydrofluorocarbons in Stationary Refrigeration and Foam End-Uses are attached. Please contact me with any questions.

Garrett McGuire

gmcguire@ahrinet.org

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/3-casnap-UDEHaVUmUmhWDwZl.pdf'

Original File Name: AHRI Comments on CARB Proposed HFC Regulation 3.9.2018.pdf

Date and Time Comment Was Submitted: 2018-03-09 11:14:47

No Duplicates.

**Comment 3 for High-Global Warming Potential Refrigerant Emissions Reductions Regulation (casnap) - 45 Day.**

First Name: Jason

Last Name: Paquette

Email Address: jpaquette@structuralconcepts.com

Affiliation:

Subject: SCC Comments on Proposed Regulation for Prohibitions on Use of Certain HFCs  
Comment:

Please see attached document.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/4-casnap-VSYAclUmAiRSNwB0.pdf'

Original File Name: Structural Concepts Corporation Comments – California Air Resources Board Proposed Regulation for Prohibitions on Use of Certain Hydrofluorocarbons in Stationary Refrigeration and Foam End-Uses.pdf

Date and Time Comment Was Submitted: 2018-03-12 11:30:42

No Duplicates.

**Comment 4 for High-Global Warming Potential Refrigerant Emissions Reductions Regulation (casnap) - 45 Day.**

First Name: Rajan

Last Name: Rajendran

Email Address: [rajan.rajendran@emerson.com](mailto:rajan.rajendran@emerson.com)

Affiliation:

Subject: Emerson Comments to Proposed HFC Regulation

Comment:

Please see the attached file for comments.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/5-casnap-BmMGbVM3BSRWIwZp.pdf>'

Original File Name: Emerson Comments to Proposed HFC Regulation - Final.pdf

Date and Time Comment Was Submitted: 2018-03-13 08:09:26

No Duplicates.

**Comment 5 for High-Global Warming Potential Refrigerant Emissions Reductions Regulation (casnap) - 45 Day.**

First Name: Jessica

Last Name: Olson

Email Address: jessica.olson2@honeywell.com

Affiliation:

Subject: Comments from Honeywell International Inc.

Comment:

Please see attached comments.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/6-casnap-BzZdY1R4VTZSZwcq.pdf'

Original File Name: 18-03-08 Honeywell Comments.pdf

Date and Time Comment Was Submitted: 2018-03-15 10:44:25

No Duplicates.

**Comment 6 for High-Global Warming Potential Refrigerant Emissions Reductions Regulation (casnap) - 45 Day.**

First Name: Jeffrey

Last Name: Fort

Email Address: jeffrey.fort@dentons.com

Affiliation: Dentons US LLP

Subject: Proposed Regulation for Prohibitions on Use of Certain Hydrofluorocarbons in Stationary Re

Comment:

See Comments regarding Proposed Regulation for Prohibitions on Use of Certain Hydrofluorocarbons in Stationary Refrigeration and Foam End-Uses

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/7-casnap-UyAFbQZmUXILIwh4.pdf>'

Original File Name: SNAP.pdf

Date and Time Comment Was Submitted: 2018-03-15 13:30:39

No Duplicates.

**Comment 7 for High-Global Warming Potential Refrigerant Emissions Reductions Regulation (casnap) - 45 Day.**

First Name: bruce

Last Name: hierlmeier

Email Address: bruce.hierlmeier@zero-zone.com

Affiliation: zero zone

Subject: HFC regulations

Comment:

please see attached regulations.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/8-casnap-BmUBZgFyBDUBWFU9.docx'

Original File Name: CARB HFC letter.docx

Date and Time Comment Was Submitted: 2018-03-18 21:04:49

No Duplicates.

**Comment 8 for High-Global Warming Potential Refrigerant Emissions Reductions Regulation (casnap) - 45 Day.**

First Name: Stephen

Last Name: Wieroniey

Email Address: stephen\_wieroniey@americanchemistry.com

Affiliation: American Chemistry Council

Subject: ACC CPI Comments on CARB HFC Proposal

Comment:

Attached are the American Chemistry Council Center for the Polyurethane Industry's comments responding to CARB's Proposed Regulation: Prohibitions on Use of Certain Hydrofluorocarbons (HFC) in Stationary Refrigeration and Foam End-Uses.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/9-casnap-AGEHYgFjU19WMwJy.pdf>'

Original File Name: ACC CPI Comments on CARB HFR Prohibitions Regulations.pdf

Date and Time Comment Was Submitted: 2018-03-19 11:17:11

No Duplicates.



**Comment 9 for High-Global Warming Potential Refrigerant Emissions Reductions Regulation (casnap) - 45 Day.**

First Name: Christina

Last Name: Starr

Email Address: cstarr@eia-global.org

Affiliation: Environmental Investigation Agency

Subject: Comments on HFC measures

Comment:

EIA's comments in support of the proposed regulatory language and additional measures are attached.

Best,  
Christina

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/10-casnap-UzZSPVMzAjJSOwZr.pdf'

Original File Name: EIAComments\_Proposed Regulatory Language\_March 2018.pdf

Date and Time Comment Was Submitted: 2018-03-19 11:59:59

No Duplicates.

**Comment 10 for High-Global Warming Potential Refrigerant Emissions Reductions Regulation (casnap) - 45 Day.**

First Name: David

Last Name: Winningham

Email Address: dave.winningham@alliedair.com

Affiliation: Lennox International

Subject: Lennox Comment on CARB Proposed Regulation for Stationary Refrigeration  
Comment:

Please see attached comments

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/11-casnap-VjpRMgRrVGkCawN7.pdf'

Original File Name: Lennox Comments CARB Proposed Regulation for Stationary Refrigeration 03192019.pdf

Date and Time Comment Was Submitted: 2018-03-19 14:48:36

No Duplicates.

**Comment 11 for High-Global Warming Potential Refrigerant Emissions Reductions Regulation (casnap) - 45 Day.**

First Name: Stephen

Last Name: Mandracchia

Email Address: smandracchia@hudsontech.com

Affiliation: Hudson Technologies Company

Subject: Prohibitions on Use of Certain Hydrofluorocarbons in Stationery Refrigeration and Foam End

Comment:

Please see attached comment letter

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/12-casnap-AGgHdAZjWXkCa1A+.pdf'

Original File Name: Hudson Comment Letter 031918.pdf

Date and Time Comment Was Submitted: 2018-03-19 14:51:41

No Duplicates.

**Comment 12 for High-Global Warming Potential Refrigerant Emissions Reductions Regulation (casnap) - 45 Day.**

First Name: Palmer

Last Name: Schoening

Email Address: pschoening@hardinet.org

Affiliation: HARDI

Subject: HARDI comments: Prohibitions on Use of Certain Hydrofluorocarbons

Comment:

See attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/13-casnap-UTkBZlckAjUHafMM.pdf'

Original File Name: HARDI comments CARB HFC phase-out.pdf

Date and Time Comment Was Submitted: 2018-03-19 15:46:04

No Duplicates.

**Comment 13 for High-Global Warming Potential Refrigerant Emissions Reductions Regulation (casnap) - 45 Day.**

First Name: Sandy

Last Name: Larson

Email Address: slarson@namanow.org

Affiliation: NAMA

Subject: NAMA CAVC Comments on Proposed CASNAP Regulation

Comment:

See attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/14-casnap-WjkCZVQnV2ZRCARn.zip'

Original File Name: CARB comments.zip

Date and Time Comment Was Submitted: 2018-03-19 15:50:13

No Duplicates.

**Comment 1 for High-Global Warming Potential Refrigerant Emissions Reductions Regulation (casnap). (At Hearing)**

First Name: Helen

Last Name: Walter-Terrinoni

Email Address: Non-web submitted comment

Affiliation: Chemours

Subject: Comments on the HFC Reduction Measures Rulemaking

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/16-casnap-AjNRbwEtVTRQewkw.pdf>

Original File Name: 18-2-9 Helen Walter-Terrinoni.pdf

Date and Time Comment Was Submitted: 2018-03-28 12:41:01

No Duplicates.

**Comment 1 for High-Global Warming Potential Refrigerant Emissions Reductions Regulation (casnap) - 15-1.**

First Name: Justin

Last Name: Koscher

Email Address: Non-web submitted comment

Affiliation: PIMA

Subject: Comments from the Polyisocyanurate Insulation Manufacturers Association  
Comment:

Please see attached comment letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/19-casnap-AXFQP1E9WGoAWQRn.pdf>

Original File Name: PIMA Comments CARB 15 Day HFC Regulatory Text FINAL  
07.02.2018.pdf

Date and Time Comment Was Submitted: 2018-07-02 08:17:38

No Duplicates.

**Comment 2 for High-Global Warming Potential Refrigerant Emissions Reductions Regulation (casnap) - 15-1.**

First Name: Stephen

Last Name: Wieroniey

Email Address: stephen\_wieroniey@americanchemistry.com

Affiliation: American Chemistry Council

Subject: Prohibitions on Use of Certain HFC in Stationary Refrigeration and Foam End-Uses  
Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/20-casnap-UTBTNIMxVFgKbwl5.pdf>

Original File Name: ACC CPI Comments on CARB HFC Prohibitions Regulations\_15 Day.pdf

Date and Time Comment Was Submitted: 2018-07-02 09:04:27

No Duplicates.



**Comment 3 for High-Global Warming Potential Refrigerant Emissions Reductions Regulation (casnap) - 15-1.**

First Name: Edward

Last Name: Wuesthoff

Email Address: edward.wuesthoff@htpgusa.com

Affiliation:

Subject: Proposed Regulation: Prohibitions on Use of Certain Hydrofluorocarbons in Stationary Refri

Comment:

Please read the attachment for HTPG response to 15 day comment period.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/21-casnap-AmpXNFExBCMCW1Uh.docx>

Original File Name: Heat Transfer Products Group.docx

Date and Time Comment Was Submitted: 2018-07-02 09:56:48

No Duplicates.

**Comment 4 for High-Global Warming Potential Refrigerant Emissions Reductions Regulation (casnap) - 15-1.**

First Name: Stephen  
Last Name: Schaefer  
Email Address: stschaefer@hoshizaki.com  
Affiliation: Hoshizaki America

Subject: Comments on modified text  
Comment:

Attached are Hoshizaki America's comments on the Proposed Regulation for Prohibitions on Use of Certain Hydrofluorocarbons in Stationary Refrigeration and Foam End-Uses

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/22-casnap-AGgAaQNxUGtWOQN5.pdf>

Original File Name: hoshizaki\_carb\_070218.pdf

Date and Time Comment Was Submitted: 2018-07-02 12:17:31

No Duplicates.

**Comment 5 for High-Global Warming Potential Refrigerant Emissions Reductions Regulation (casnap) - 15-1.**

First Name: Marie

Last Name: Carpizo

Email Address: mcarpizo@ahrinet.org

Affiliation:

Subject: AHRI Comments to ARB Proposed Reg. for Prohibitions on the Use of Certain HFCs  
Comment:

Please find attached the Air-Conditioning, Heating and Refrigeration Institute's (AHRI) comments in response to the California Air Resource Board (ARB) Notice of Public Availability of Modified Text to the Regulation for Prohibitions on Use of Certain Hydrofluorocarbons in Stationary Refrigeration and Foam End-Uses issued on June 15, 2018.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/23-casnap-AWBdM1MgUmgDWlUz.pdf>

Original File Name: AHRI FINAL Comments on CARB 15 day language 07.02.2018.pdf

Date and Time Comment Was Submitted: 2018-07-02 13:24:28

No Duplicates.

**Comment 6 for High-Global Warming Potential Refrigerant Emissions Reductions Regulation (casnap) - 15-1.**

First Name: Ronald

Last Name: Shebik

Email Address: ron.shebik@hussmann.com

Affiliation: Hussmann Corporation

Subject: CARB CASNAP Rule 1 15 Day Notice

Comment:

Please see attachment

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/24-casnap-UztUJ10vAyNXPARl.docx>

Original File Name: Hussmann Comments Proposed 15-day Language for CARB SNAP 20.docx

Date and Time Comment Was Submitted: 2018-07-02 15:05:57

No Duplicates.