

Ozone Depleting Substances (ODS) 2020 Updates

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ODS Update

- EPA published final rule regarding non-exempt substitute refrigerants on February 26, 2020 – example HFC's
- **With the new change effective April 10, 2020, the requirements only apply to only to Class I (CFCs) and Class II (HCFCs) refrigerants. Substitute refrigerants are now exempt!**
- The rule rescinds the extension of the leak repair provisions to appliances using non-exempt substitute refrigerants.
- **Note – 40 CFR 82.157 provisions (including leak repair) was applicable to non-exempt substitutes between 1/1/2020 and 4/10/2020**

MAJOR CHANGES – EFFECTIVE April 10, 2020

Effective April 10, 2020, appliances with 50 or more pounds of substitute refrigerants will no longer be subject to the requirements at 40 CFR 82.157, including:

- Repairing appliances that leak above a certain level and conducting verification tests on repairs;
- Periodically inspecting for leaks;
- Reporting chronically leaking appliances to the EPA;
- Retrofitting or retiring appliances that are not repaired; and
- Maintaining related records

MAJOR CHANGES – EFFECTIVE April 10, 2020

So, the question is what is a substitute?

EPA Defines this in 40 CFR 82.152

Substitute means any chemical or product, whether existing or new, that is used as a refrigerant to **replace a class I or II ozone-depleting substance. Examples include, but are not limited to hydrofluorocarbons, perfluorocarbons, hydrofluoroolefins, hydrofluoroethers, hydrocarbons, ammonia, carbon dioxide, and blends thereof.** As used in this subpart, the term “exempt substitutes” refers to certain substitutes when used in certain end-uses that are specified in §82.154(a)(1) as exempt from the venting prohibition and the requirements of this subpart, and the term “non-exempt substitutes” refers to all other substitutes and end-uses not so specified in §82.154(a)(1).

Reference of All Réfrigérants (can sort by type):

https://en.wikipedia.org/wiki/List_of_refrigerants#Type_and_flammability

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- Example HFCs Include (just a sample):

R-Number	Chemical Name	CAS No.
R-23	Trifluoromethane (Fluoroform)	75-46-7
R-32	Difluoromethane	75-10-5
R-134a	1,1,1,2-Tetrafluoroethane	811-97-2
R-404A	R-125/143a/134a	
R-407A	R-32/125/134a	
R-407C	R-32/125/134a	
R-407F	R-32/125/134a	
R-417A	R-125/134a/600	
R-422A	R-125/134a/600a	
R-422D	R-125/134a/600a	
R-423A	R-134a/227ea	
R-424A	R-125/134a/600a/600/601a	
R-427A	R-32/125/143a/134a	
R-428A	R-125/143a/290/600a	
R-434A	R-125/143a/134a/600a	
R-437A	R-125/134a/600/601	
R-438A	R-32/125/134a/600/601a	
R-507A	R-125/143a (50/50)	
R-508B	R-23/116 (46/54)	
MO89	ISCEON® MO89	