



CALIFORNIA - SNAP REGULATORY UPDATE – JANUARY 2019

In September, California signed into state law the now-defunct federal EPA SNAP delistings. This law changes the status listing of certain refrigerants used in specific applications. California did this in response to the DC Circuit Court revoking the federal EPA SNAP delisting Rule 20 as it pertained to HFCs. The result is that California has ruled that various HFCS and HFC blends that were previously considered Acceptable substitutes for CFCs and HCFCs, have been changed to Unacceptable in specific end-uses in the refrigeration and air conditioning sectors. This rule does not prohibit the manufacture of the refrigerants, only certain uses in specific applications.

Specific end uses in the Refrigeration and Air Conditioning sector impacted are:

RETAIL FOOD REFRIGERATION

(New & Retrofit)

- Supermarket systems
- Remote condensing units
- Stand-alone equipment

COLD STORAGE WHSES

(New Only)

COMFORT COOLING CHILLERS

(New Only)

- Centrifugal
- Positive displacement

Below is a chart of refrigerants used in **RETAIL FOOD REFRIGERATION** that have been affected by the status changes and the corresponding effective date:

	SUPERMARKET		REMOTE COND. UNIT		STAND -ALONE			
	NEW	RETROFIT	NEW	RETROFIT	MT <2,200 BTU/hr & no flooded evap NEW	MT ≥2,200 BTU/hr; with or without flooded evap NEW	LT NEW	LT & MT RETROFIT
R-404A & R-507	Jan. 1, 2019	Jan. 1, 2019	Jan. 1, 2019	Jan. 1, 2019	Jan. 1, 2019	Jan. 1, 2020	Jan. 1, 2020	Jan. 1, 2019
R-407A/C/F	Okay to use	Okay to use	Okay to use	Okay to use	Jan. 1, 2019	Jan. 1, 2020	Jan. 1, 2020	Okay to use
R-134A	Okay to use	Okay to use	Okay to use	Okay to use	Jan. 1, 2019	Jan. 1, 2020	Okay to use	Okay to use

Supermarket Systems

- Multiplex or centralized, direct or indirect systems
- Distributed refrigeration system (direct), secondary loop & cascade (indirect)
- Generally more than 2 compressors per rack system and parallel piped
- Ice makers connected to a supermarket system included

Remote condensing unit

- Typically 0.3 - 5.7 refrigeration tons
- Have one or two compressors, one condenser, one receiver assembled in a single unit
- Normally located outside sales area

Stand-alone

- Refrigerators, freezers & reach-in coolers, open or with door(s)
- Fully charged with refrigerant at the factory & typically only needs an electric supply



CALIFORNIA - SNAP REGULATORY UPDATE – OCTOBER 2018

Below is a chart of refrigerants used in **COLD STORAGE WAREHOUSES** that have been affected by the status changes and the corresponding effective date:

	COLD STORAGE WAREHOUSE	
	NEW EQUIPMENT	RETROFIT
R-404A/R-507/R-407A	Jan. 1, 2023	No restrictions

Cold storage warehouse

- Temp controlled facilities used to store meat, dairy, produce, etc. prior to distribution to Retail Food
- Coolers or Freezers
- Public or private
- Includes packing products in containers for shipment

Below is a chart of refrigerants used in **COMFORT COOLING CHILLERS** that have been affected by the status changes and the corresponding effective date:

	CENTRIFUGAL & POSITIVE DISPLACEMENT	
	NEW EQUIPMENT	RETROFIT
R-134a/R-404a/ R-407C/R-410A/R-507	Jan. 1, 2024	No restrictions

Centrifugal chiller

- Water-cooled, aerodynamic/turbine type
- Capacities range from 200 -2100kW (60 - 60,000 refrigeration tons)

Positive displacement chiller

- Reciprocating, screw or scroll type
- Capacities range from 10 -7,000Kw (3 - 510 refrigeration tons)



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SNAP DELISTING RULE Q & A

- What is the difference between “supermarket systems” and “remote condensing units (RCU)”?

The number of compressors in the remote condensing system. RCU’s typically have only one or two compressors linked to a single condenser whereas supermarket systems generally have more than two compressors arranged in a parallel piped rack.

- What category does a commercial walk-in cooler or freezer fall in?

It depends. If the walk-in is supplied by the refrigerant on the same multi-compressor circuit used to cool food elsewhere, then it is a supermarket system. If the walk-in’s one or two compressor system is dedicated to the cooling requirements of just the individual walk-in, then it is a remote condensing unit.

- Can I replace components in a supermarket system or remote system without having to change the refrigerant?

Yes, replacing a component is considered service and OEMs will still be able to manufacture components rated for delisted refrigerants. A condensing unit is considered a component and can be replaced.

- Can a new or used R-404A rack system be installed in a supermarket with existing fixtures after January 1, 2019 and use R-404A as the refrigerant?

No. There can be no new systems installed using R-404A after December 31, 2018. A system that was previously used for R-404A at a different location will be considered a new system if installed elsewhere as of January 1, 2019. Its components, however, can be used to repair/service an R-404A system that was functioning before January 1, 2019.

- Can a used R-404A rack system and refurbished fixtures be installed in a new supermarket after January 1, 2019 and use R-404A as the refrigerant?

No. If an old complete system (compressor rack, cases, etc.) is moved to and set up at another location, that would be considered a “new” system and would need to be completed by January 1, 2019. If, however, there is already an operating system at that other location, parts from the decommissioned system could be used to repair that existing system in that other location. In this situation too, the repair must be of the existing system and must not somehow add to it, e.g. by adding additional cases and additional capacity, if done after January 1, 2019.

- Can existing display cases be replaced with ones that operate at a higher evaporator temperature and continue to use the existing refrigerant?

Yes, because the new display cases still provide the same purpose of maintaining products at required temperatures and additional compressor capacity is not required. That is, this type of remodel does not change the intended purpose of the system.



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SNAP DELISTING RULE Q & A

- Can additional cases, compressors or refrigerant be added that were not supported by the original system and continue to use the existing refrigerant after January 1, 2019?

No. This is considered a “new” system because they were not supported by the original system and, therefore, if the original refrigerant is one of the refrigerants prohibited for use in a new system as of January 1, 2019, it could not be used in the expanded system.

- Can equipment, installed and functioning with R-404A as of January 1, 2019, continue to be serviced with R-404A?

Yes, it can be serviced with R-404A for its useful life as determined by the equipment owner.

- Can a used R-404A remote condensing unit and used matching evaporator be installed after January 1, 2019 and still use R-404A as the refrigerant?

No, because this will be considered a new system.

- Can I add on to an R-404A supermarket system or is that considered a retrofit?

If the parts expand the capacity of the system and require additional refrigerant, installing such would be considered a “new” system, not a retrofit and would not be allowed as of January 1, 2019. Importantly, if the cost to repair or replace system components or the cumulative cost to do so exceeds 50% of the capitol cost of replacing the entire system over a three period beginning January 1, 2019, then it would be no longer be considered a repair... it would be considered a new system and, therefore, would be prohibited.

- What additions can be made to an R-404A supermarket system without it being considered a “new” system?

If a supermarket remodel or expansion changes the intended purpose of the original equipment, for instance by adding additional cases, compressors, and refrigerant that were not supported by the original compressor system, it would consider the expanded system a “new” system and therefore, is not allowed.

- Is it considered a retrofit if a complete R-22 system is replaced by a complete R-404A system?

No, it would be considered a new system and must be installed and operating as of December 31, 2018 for supermarket systems and remote condensing units.

- Can I retrofit an R-22 system supermarket or remote condensing unit after January 1, 2019 with reclaimed R-404A?

No, the use of new or reclaimed R-404A as a retrofit refrigerant is prohibited in those applications as of January 1, 2019.



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SNAP DELISTING RULE Q & A

- What is the difference between a remote condensing unit and a cold storage warehouse?

The difference is in how they are used. A remote condensing supports a retail food operation, such as a restaurant, that stores food in a walk-in cooler prior to preparation for a consumer. Similarly, a supermarket may use a remote condensing unit (not part of the rack refrigerant circuit) to keep food frozen until it is ready to be stocked in a display case for sale to a consumer. A cold storage warehouse, on the other hand, stores food, produce, dairy, etc. or is used to package food, produce, dairy, etc. prior to it being distributed to the supermarket or restaurant.

- What category does an “ice maker” fall into?

Ice makers is a broad category of machines designed for the sole purpose of producing ice, in various shapes and sizes, with different retrieval mechanisms (ex. dispensers or bins).

Commercial ice machines are a different end-use than retail food refrigeration.

Self-contained ice makers as well as ice-making units connected via piping to a dedicated remote condenser, are not considered retail food refrigeration end-uses and, therefore, are not affected by this delisting rule.

- What if the ice maker makes ice for use in the store, such as for use in meat and seafood storage or display?

If the supermarket rack system supplies refrigerant to a unit to make the ice, and that refrigerant and compressor rack are part of a larger circuit that also provides cooling for other products in the store, the entire system is classified as a “supermarket system” and subject to this delisting rule.

- What if the ice making unit is solely connected via piping to a dedicated remote condenser?

This is not considered to fall under the retail food refrigeration end-use so it is not affected by this delisting rule.