



EPA's final rule on HFC phasedown: Key updates for HVACR contractors

On September 20, 2024, the Environmental Protection Agency (EPA) [finalized a rule](#) under the AIM Act to manage hydrofluorocarbons (HFCs) and their substitutes. This new regulation establishes the Emissions Reduction and Reclamation (ER&R) Program, which outlines requirements for the management of HFC emissions and promotes the reclamation of HFCs. The rule affects HVACR contractors and the owners or operators of equipment in the refrigeration, air conditioning, and heat pump (RACHP) sector. Below are some of the details HVACR professionals should know.

What is the AIM Act?

The **American Innovation and Manufacturing (AIM) Act**, enacted on December 27, 2020, authorizes EPA to phase down HFCs in three key areas:

1. Phasing down production and consumption of HFCs.
2. Managing HFC emissions through reclamation and minimizing releases.
3. Transitioning to next-generation technologies in various sectors.

The ACCA HVAC Blog previously covered the [2021 rule phasing down HFCs](#) and celebrated winning a sell-through period for R-410a equipment in [the 2023 technology transition rule](#). [This final rule](#) focuses on maximizing HFC reclamation and minimizing releases from equipment.

Key provisions and compliance deadlines

Leak repair requirements

- Applies to: Refrigerant-containing appliances with a charge of 15 pounds or more of HFCs or substitutes with a GWP greater than 53. Residential and light commercial applications are **not included** under these requirements.
- Leak rate thresholds:
 - 30% for Industrial Process Refrigeration (IPR)
 - 20% for Commercial Refrigeration
 - 10% for Comfort Cooling, Refrigerated Transport, and other appliances
- Compliance date: January 1, 2026.



Automatic Leak Detection (ALD) systems

- New equipment: All new commercial and industrial process refrigeration (IPR) appliances with a charge size of 1,500 pounds or more of HFCs must install ALD systems.
 - Compliance date: Within 30 days of installation, starting January 1, 2026.
 - Existing equipment: Systems meeting the criteria above that were installed between January 1, 2017, and January 1, 2026, must be retrofitted to add ALD systems by January 1, 2027.

Reclaimed HFC requirements

- Reclaimed HFCs: Must contain no more than 15% virgin HFCs by weight and must be labeled accordingly.
 - Compliance date: January 1, 2026.
- Prohibition on virgin HFC for service and repair: Starting in 2029, only reclaimed HFCs may be used to service supermarket systems, refrigerated transport, and automatic commercial ice makers.
 - Compliance date: January 1, 2029.

Disposal of HFCs from disposable cylinders

- Requirement: Disposable cylinders containing HFCs must be sent to an EPA-certified reclaimer, recycler, or final processor to remove remaining refrigerants.
 - Compliance date: January 1, 2028.
- Alternative method: Certified technicians can evacuate disposable cylinders to 15 inches of mercury (in-Hg) and provide certification before disposal. If evacuated by a certified technician, the disposable cylinders are **not** required to be sent to an EPA-certified reclaimer for additional processing.

Recordkeeping and reporting

- Recordkeeping: To the extent contractors perform work subject to the provisions above, there are specific requirements to keep records of refrigerant additions, leak inspections, ALD audits, and HFC disposal for at least three years.
- Reporting deadlines: Reclaimers and refrigerant distributors must submit two-time reports by February 14, 2027, and February 14, 2028, detailing reclaimed HFC data for affected sectors.

Additional resources

- More information on HFC management: [Managing HFCs and Their Substitutes](#)
- EPA certified reclaimers: [EPA Certified Reclaimers](#)