



November 12, 2020

CSI Client Advisory 15-2020

SUBJECT: Refrigerant Blending

Due to the lack of availability of R-404A refrigerant, particularly in Europe, CSI has received several inquiries with regard to the feasibility of mixing or blending refrigerants in U.S. waters. In consultation with U.S. Coast Guard Headquarters (CG-ENG-3), as well as the Environmental Protection Agency (EPA), the following guidance has been established to guide your refrigerant use while calling US ports:

The United States Clean Air Act (CAA) Title VI regulations apply to all ships calling U.S. Ports. A refrigerant or blend of refrigerants must be listed 'acceptable' by the Significant New Alternatives Policy (SNAP) Program. The SNAP program lists acceptable refrigerants by specific types of units, and can be found at: <https://www.epa.gov/snap/substitutes-refrigeration-and-air-conditioning>. Use of the refrigerant or refrigerant blend must also follow all requirements, including use restrictions if applicable, under its respective SNAP listing. EPA prohibits the use of any refrigerants or refrigerant blends in systems or appliances not designed for their use. Therefore, no vessels are allowed mix and use refrigerants at a U.S. port if it is a refrigerant blend that is not listed as acceptable by SNAP.

In addition, requirements under the CAA Section 608 requires all ships calling U.S. ports to adhere to applicable refrigerant management program requirements and explicitly prohibits venting. Only three types of 'permitted' releases exist under the prohibited venting clause:

1. "De minimis" quantities of refrigerant released while making good faith attempts to recapture and recycle or safely dispose of refrigerant including releases that occur when connecting or disconnecting hoses to [charge or service appliances](#).
2. Refrigerant emitted during the normal operation of air-conditioning and refrigeration equipment (as opposed to during the maintenance, servicing, repair, or disposal of this equipment), such as from mechanical purging and leaks. However, EPA requires that [leaks](#) above a certain size be repaired in equipment that contains 50 pounds of refrigerant or more.
3. Releases of substitute refrigerants that EPA has determined do not pose a threat to the environment.

In addition, refrigerant management and recordkeeping requirements are required and can be found in the EPA regulations under the following hyperlink for Title [40 CFR Part 82, Subpart F](#) (Recycling and Emissions Reduction).

This Client Advisory, along with previously issued CSI Advisories, can be retrieved from our website, www.compliancesystemsinc.com. Should you have any questions regarding this advisory, please do not hesitate to contact our office at csi@compliancesystemsinc.com or +1-912-233-8181.