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**Subject:** SNAP -- Refrigerant Charge Size  
SNAP Charge Size Fact Sheet May 2017 Final Agencies (00061810).docx

Jenn, let me know you all had a good discussion about ENERGY STAR and the SNAP program as it relates to the charge size for Isobutane. Thank you for your willingness to work with us on these issues. You had asked for a one-pager on the SNAP issue, which is attached. Please let me know what else you need in this area. Moving ENERGY STAR back to DOE for our products and increasing the charge size for refrigerators for Isobutane are our top priorities right now.

Thanks again.

**Kevin Messner**

**Senior Vice President, Policy & Government Relations**

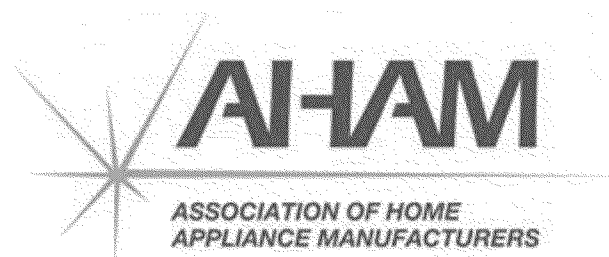
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## *Significant New Alternatives Policy (SNAP) Refrigerant Charge Size for Refrigerators*

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### **Background**

On December 20, 2011, EPA’s Significant New Alternatives Policy (SNAP) program allowed the use of Isobutane (R-600a) in household refrigerators (Fed. Reg. 78832). An appliance manufacturer had petitioned EPA for this allowance. Isobutane is a flammable refrigerant, and the final rule included a use condition that limits the refrigerant charge to 57 grams (2.0 ounces) or less for each sealed refrigeration system (i.e., compressor, condenser, evaporator, and refrigerant piping). The charge size is the amount of refrigerant that is allowed in each sealed refrigerant system within a refrigerator. Generally, a refrigerator/freezer has one sealed system that cools the fresh food compartment and the freezer compartment, but it could be two systems – one for the fresh foods and one for the freezer.

The SNAP rule based the charge size amount on the Underwriters Laboratories (UL) safety standard (UL-250) for household refrigeration end-use, which limited the quantity of the refrigerant (i.e., “charge size”) in a refrigerator or freezer to 57 grams. In EPA’s final rule, the agency stated that they do not have sufficient information to support a charge size limit different from one based on UL 250, such as the 150-gram limit in IEC 60335–2–24. The final rule stated EPA understands that the limit in UL 250 may change in the future. If that occurs, and if the appropriate safety testing data is submitted to EPA supporting safe use of a larger charge, EPA stated it would consider modifying the use conditions.

Based on testing and lengthy analysis, on April 28, 2017, the maximum charge size allowance in the UL standard was changed following the rest of the world, which has used flammable refrigerants for decades without significant safety problems. UL 250 was redesignated as UL 60335-2-24 to be consistent with the international IEC numbering system and raised the charge size allowance from 57 grams to 150 grams in each separate refrigerant circuit. During the approval process of this update, the Consumer Product Safety Commission (CPSC) staff stated that they do not oppose the proposal to increase the maximum flammable refrigerant charge size in household refrigerators to 150 grams from 57 grams. They stated that standards in Latin America, Europe, and other countries allow household refrigerators to use up to 150 grams of flammable refrigerant.

### **AHAM Position**

AHAM supports quickly revising the EPA SNAP allowance for Isobutane (R-600a) through a Direct Final Rule to update it to the most recent safety standard, which would mean an increase in the allowance of refrigerant quantity in a household refrigerator from 57 grams to 150 grams. This would only be a technical change. The use of HFCs as refrigerants have been banned by EPA in 2021 and manufacturers need the SNAP charge size allowance changed as soon as possible to allow for time for design and retooling.

This is supported by the April 28, 2017 update to the safety standard, during which the CPSC participated in its development and did not oppose the change. Because EPA's original SNAP listing used the then current safety standard limit of 57 grams, it should update the allowance to reflect the new, updated standard of 150 grams. The increased allowance will provide more flexibility for manufacturers to design products at a lower cost. There would be no cost impact and likely cost savings to manufacturers to update the SNAP allowance to reflect the larger charge size.

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