

HVAC REFRIGERANT UPDATE BULLETIN

Subject: Transition from HFC to A2L Refrigerants

Effective Date: January 1, 2025, ALL new HVAC systems using HFC 410a must be installed before January 1, 2026

Audience: Maintenance Teams, Property Managers, Technicians, and Industry Partners

What's Changing?

The HVAC industry is transitioning **away from HFC (Hydrofluorocarbon) refrigerants** such as R-410A and R-134a and moving toward **A2L refrigerants**, which are **mildly flammable (classified as "slightly flammable")** but offer **lower Global Warming Potential (GWP)**.

Why the Change?

This transition is required by the Environmental Protection Agency under authority of the American Innovation and Manufacturing (AIM) Act. The transition aligns with federal and international efforts to phase down HFCs due to their high environmental impact.

- **Lower GWP = better for the planet**
- **Improved energy efficiency in newer systems**

What Are A2L Refrigerants?

A2L refrigerants (e.g., R-32, R-454B) are:

- **Slightly flammable** (but safely used when properly handled)
- **More environmentally responsible**
- Require **new safety protocols and equipment compatibility**

What Does This Mean for Us?

1. Deadlines

- o New field-assembled 410a HVAC systems can be installed **until January 1, 2026** as long as system components (e.g., condensing units, evaporators, air handlers) were imported or manufactured before January 1, 2025. If components were manufactured or imported after January 1, 2025, installation of these components was prohibited as of January 1, 2025.
- o New variable flow refrigerant and heat pump systems have until January 1, 2027, or January 1, 2028, for installation, depending on building permit issuance dates and component import or manufacture dates.
- o Factory-completed HVAC products (i.e. do not require field assembly, only connection to power source) will not be sold or distributed beginning January 1, 2028.

2. New Equipment Compatibility

- o Existing HFC systems **cannot be retrofitted** to use A2L.
- o All new installations must be **A2L-compatible after December 31, 2025**.

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3. Existing Equipment

- o Components needed to service or repair existing 410a systems are not directly impacted (although availability could decrease).

4. Training & Certification

- o Technicians must be trained on **safe handling**, storage, and transport of A2L refrigerants.
- o Updated **EPA Section 608** training and **manufacturer-specific guidance** is highly recommended.

5. Tools & Storage Updates

- o Ensure tools and leak detectors are **A2L-compatible**.
- o Storage areas must comply with **new ventilation and safety codes**.

6. Labeling & Signage

- o Units using A2L refrigerants must be clearly **labeled with safety warnings**.
- o **Do not mix** refrigerants or attempt unauthorized retrofits.

7. Other Upcoming Requirements

- o Beginning July 1, 2026, HFC comfort cooling appliances with a charge size of 15 or more pounds of refrigerant will be subject to leak detection and repair requirements.
- o Requirements include leak inspections (by certified technicians), calculating leak rates, leak repair timelines, and retrofit/retirement plans if a system cannot be repaired below leak thresholds.

Action Items

- Schedule technician training on A2L refrigerants
- Review inventory of tools and storage to ensure compliance
- Plan for equipment phase-outs and new purchases accordingly
- Stay up to date on **local codes and fire safety regulations**