



SNAP and Section 609 Update

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Agenda

1. SNAP MVAC Final Rule

2. SNAP Review of Alternatives

3. 609 Standard Update

4. On the Horizon



SNAP MVAC Final Rule

SNAP MVAC final rule
signed & published



SNAP MVAC Final Rule

HFC-152a – acceptable
with use conditions



SNAP MVAC Final Rule

Engineering strategies and/or devices shall be incorporated into the system such that foreseeable leaks into the passenger compartment do not result in R-152a concentrations of 3.7% v/v or above in any part of the free space inside the passenger compartment for more than 15 seconds when the car ignition is on.



SNAP MVAC Final Rule

Engineering strategies incorporated into foreseeable leak scenarios in the passenger compartment do not result in R-152a concentrations of 7% v/v or above in any part of the free space inside the passenger compartment for more than 15 seconds when the car ignition is on.

Free space: space inside the passenger compartment excluding the space enclosed by the ducting in the HVAC module



SNAP MVAC Final Rule

Engineering strategies and/or devices shall be incorporated into the system such that foreseeable leaks into the passenger compartment do not result in R-152a concentrations of 3.7% v/v or above in any part of the free space inside the passenger compartment for more than 15 seconds

when the car ignition is on.



SNAP MVAC Final Rule

Manufacturers must adhere to all the safety requirements listed in the SAE Standard J639, and incorporate unique fittings, flammable refrigerant warning label



SNAP MVAC Final Rule

Additional training for service technicians recommended.

Manufacturers should conduct and keep on file failure mode and Effect Analysis (FMEA) on the MVAC as stated in SAE J1739.



SNAP MVAC Final Rule

CO₂ – final decision
deferred



SNAP MVAC Final Rule

EPA is currently continuing to consider further several issues with respect to this regulatory action.



SNAP Review of Alternatives

- Have not received a complete submission for a low GWP refrigerant
- New chemical alternatives must undergo review under both section 612 and section 5 of Toxic Substances Control Act (TSCA)



SNAP Review of Alternatives

- *The New Chemicals Program functions as a "gatekeeper" which can identify conditions, up to and including a ban on production, to be placed on the use of a new chemical before it is entered into commerce.*
- *<http://epa.gov/oppt/newchemicals/index.htm>*
- Extensive coordination between SNAP and premanufacture notice (PMN) underway
- SNAP defers to PMN on evaluation of toxicity results and AELs



SNAP Review of Alternatives

SNAP criteria for review

- Atmospheric effects and related health & environmental impacts
- General pop risks from ambient exposure to compounds with direct toxicity and to increased ground-level ozone
- Ecosystem risks
- Occupational risks
- Consumer risks
- Flammability
- Cost & availability of the substitute



SNAP Approval Timing

- EPA's 90-day review period for SNAP submissions would begin once EPA receives a complete submission
- As with HFC-152a, approval of any flammable substitute requires a rulemaking because all flammable substitutes are prohibited in new & retrofit MVACs



Section 609 Update

- Updated references to Section 609 approved refrigerant handling machines
- Grandfathered previously certified machines
- J2210 certified machines can be sold, as long as manufactured before January 1, 2008



On the Horizon

- Review of SNAP MVAC acceptable list
- Update Section 609 technician training & testing
- Provisions for alternate refrigerant servicing



Thank you!

For further information:

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