

Slide 1



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We all have read the recent US EPA press releases regarding the reconsideration of the proposed technology transition rule including petitions to the US EPA to increase the current 150 GWP limit for Cold Storages.

Our organization and the many companies that we represent applaud all efforts to have our government represent hardworking individuals and the companies and industry in which they work. Individuals supporting ammonia refrigeration system design, installation, operation, and maintenance **represent the large majority of those supporting Cold Storages in the USA** and we are glad to see willingness at the federal level to better represent this majority. This majority also supports state level support of the ammonia refrigeration industry, including support from California and its state agencies of CARB, Cal/OSHA, & CalEPA.

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EPA Press Release

The Technology Transitions Rule, implemented by the Biden-Harris EPA, would, starting next year, require cold storage warehouses to use products like ammonia or carbon dioxide **instead of more available alternatives**. The rule also forces companies to use particular technologies for refrigerant systems, using substances like ammonia that are more toxic and flammable. **The Technology Transitions Rule raises the cost of food at the grocery store, harms semiconductor manufacturing, and restricts Americans from being able to purchase affordable air conditioning systems for their homes.**

 The International Institute of Ammonia Refrigeration

We also applaud all efforts at the state and federal level to maintain and reduce costs of goods, including food and beverages, for all Americans, and hope that we can better inform you, and all organizations within California, on how and where your efforts can have the largest impact.

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Ammonia's Proven Success in F&B and Cold Storage

- Ammonia is by far the most commonly used refrigerant in large cold storage and food processing. 91% for Cold Storages
- Warehouses benefit by aligning with upstream F&B manufacturers who overwhelmingly use ammonia, often co-located w/ cold storage.



■ Ammonia

■ Other

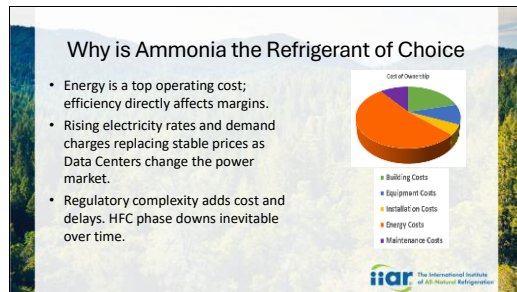


 The International Institute of Ammonia Refrigeration

All studies show that ammonia is the majority refrigerant used for food storage and food processing in the USA, including a 2023 Global Cold Chain Alliance Benchmarking survey showing 91% of those responding use ammonia as a refrigerant.

With our organization's original mission to advocate for the safe and efficient use of ammonia refrigeration, we also know that an overwhelming majority of major food processing plants use ammonia refrigeration.

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But why does such a large majority use ammonia? Energy is the main cost of cold storage ownership, driven mainly by the electrical use of the cooling and refrigeration systems.

Same for food processing plants.

Other ownership costs include:

- For synthetic refrigerant-based systems – the major refurbishment and often replacement changes that are necessary to a company's refrigeration system as synthetic refrigerant manufacturers change their current blends or future findings prohibit that refrigerants use.
- For ammonia refrigerant based systems - regulatory complexity that requires unnecessary staff and costs to maintain the paperwork.

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IIAR's extensive refrigerant evaluator tool not only shows the make-up of all refrigerants but also conveys the relative electrical efficiency in Brake-Horse-Power per Ton of Refrigeration at various common condensing temperatures of 70, 95, and 120 degrees Fahrenheit. You can see that R-134a, a main component of R-513a requires 17 – 22% more energy than ammonia.

And R-513A, which is a blend of R-134a and another chemical necessary to lower the GWP of this blend, suffers a reduction in efficiency to where R-513A requires 19 – 32% more energy than ammonia.

Other independent studies comparing ammonia and R-513A chillers and comparing ammonia to other similar HFC refrigerants show similar results.

These operational and thermodynamic efficiencies of ammonia are why facilities, whose main cost of ownership is energy, choose ammonia.

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Why is Ammonia the Refrigerant of Choice

Ammonia vs. Synthetics: Cost, Sustainability, Supply

Ammonia: <ul style="list-style-type: none">• ~\$1⁰⁰/_{lb.} to ~\$3⁰⁰/_{lb.}• zero ODP, zero GWP,• widely available.	HFC R-513A: <ul style="list-style-type: none">• ~\$18⁰⁰/_{lb.} to ~\$24⁰⁰/_{lb.}• PFAS-based blend,• patented supply constraints
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Other reasons ammonia is the top choice for Cold Storage and Food Processing in the USA include:

- Cost of the initial charge and refrigerant replacement upon leaks or servicing. With Cold storage systems requiring hundreds and often thousands (1000) of pounds of refrigerant, an initial 1000 lb. charge would cost only 1,500 to \$3,000 for ammonia, while it would cost \$18,000 to \$24,000 for R-513A, 8-12 times more for the same refrigerant charge.
- Ammonia refrigeration systems have been used for over one hundred years, with many systems still operating many decades after installation and requiring only upgrades for energy efficiency and servicing. Many businesses have had to change their cooling systems as synthetic refrigerants are found to be harmful, such as CFCs that harmed the ozone layer, or the chemical manufacturer changes their blends or increases their pricing for commercial reasons.
- Ammonia is used primarily for the agriculture industry but has uses as feed stock for many other necessary chemicals, and for growing use as a fuel for ships. Because it is unpatented, highly used, and widely available, it will be around for many years to come.

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What Limits the choice of ammonia

Ammonia Toxicity

- IIAR standards, building codes, PPE, and emergency plans underpin safe operation.
- Toxicity is well-managed through design, maintenance, and training.



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So now that you understand why ammonia is the number one choice, what limits the choice for ammonia?

Ammonia is a toxic substance upon release. However mechanical refrigeration systems are closed loop systems, meaning the refrigerant is meant to stay in the pipes and not be released. 50 years ago, no building codes nor standards existed for ammonia refrigeration systems. Thus, releases were more common.

Today in the USA, IIAR standards for the design, installation, commissioning, operation and maintenance of ammonia refrigeration systems exist, and are adopted and required by the ICC's International Building & Mechanical Codes and IAPMO's Uniform Mechanical code, codes required by most states and municipalities in the USA, including California.

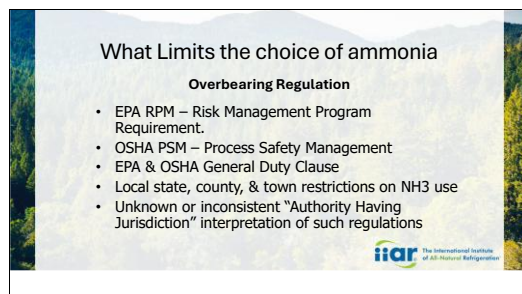
Adoption and required use of the practices detailed in these standards and codes, by those building and operating ammonia refrigeration systems, has led to a strong safety record when compared to other widely used chemicals including gasoline, propane, natural gas, chlorine, etc.

In addition, organizations such as RETA, IIAR, and many other companies have in-person and online training and certification programs widely used by all for ammonia refrigeration design, operation, and maintenance, and

many companies require such training and certification for their employees. In addition, training exists for proper PPE usage during maintenance and critical tasks of updating and maintaining ammonia refrigeration systems. And guidelines and training exist for proper emergency action preparedness.

No other refrigerant has such detailed standards that are required for its use, and this has led to its extremely safe record.... Because of minimal incidents, many lay persons have no idea about such broad use of ammonia refrigeration within the Food & Beverage industry, and often in their town or community.

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What Limits the choice of ammonia

Overbearing Regulation

- EPA RMP – Risk Management Program Requirement.
- OSHA PSM – Process Safety Management
- EPA & OSHA General Duty Clause
- Local state, county, & town restrictions on NH₃ use
- Unknown or inconsistent "Authority Having Jurisdiction" interpretation of such regulations

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So, what else makes an end user hesitate on using ammonia for Cold Storage and Food Processing cooling and refrigeration needs?

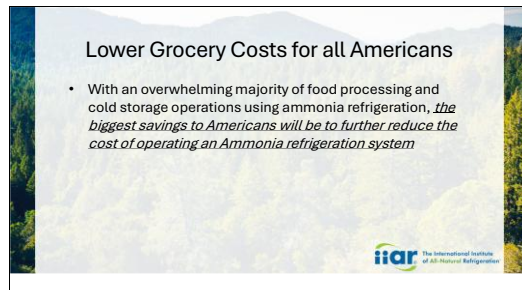
Probably the largest reason for concern comes from the knowns and unknowns of governmental regulation.

The known regulations are a daunting amount of paperwork requiring internal and external labor to maintain, evaluate, re-evaluate, report, and hope that their qualified persons' interpretation of all regulatory requirements match the interpretation of many different potential inspections that can be

conducted by many different governmental organizations.

The unknown regulations or concerns of unknowns are also a barrier – what regulations and paper-work have I possibly missed? And what are the potential fines? Even if I have completed all regulatory processes, will my work and actions be considered correct during an audit by the Authority having Jurisdiction? And if not, will I be immediately fined or will I have time to accommodate the changes without a fine?

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You can see that ammonia refrigeration systems already dominate in the Cold Storage and Food Processing sector for good reason:

- They are the least expensive to operate from an energy standpoint.
- Ammonia refrigerant is by far the least expensive, widely available, and will be available essentially forever, unless the agriculture and chemical industry find a replacement for their large use of ammonia, and unless its accelerated growth for use in the fuel industry for unknown reasons comes to a halt.
- Ammonia refrigerant has a proven history of minimal to zero long-term environmental effects, proven by centuries of significant use in refrigeration, agriculture, as a cleaning agent in many

homes, and coming as a fuel & energy carrier.

- Ammonia has a GWP of 0 and an ODP of 0.
- No other refrigerant has such detailed standards requirements leading to a strong safety record when compared to other widely used chemicals including gasoline, propane, natural gas, chlorine, and other synthetic refrigerant systems that are not immune to disasters and incidents.

Because of these strong advantages, large and medium sized cold storage and food processing companies overwhelmingly use ammonia refrigeration systems even with restrictive and costly regulations.

Small companies often choose to use ammonia even with the regulatory burdens, finding their costs to adhere to regulations are still offset by the other cost savings of ammonia, and no concerns of having to change refrigerants down the road.

So, the best way for government to lower the costs of food for all American's is to reduce the costs of operating an Ammonia refrigeration system.



And the largest impact in reducing the costs of operating an Ammonia refrigeration system will be to reduce the regulatory burdens on the refrigeration systems that dominate the market, which are closed-loop ammonia refrigeration systems.

We strongly believe that the creation of standards for ammonia systems and the adoption of those standards by all building codes has led to a very safe industry. We at IIAR, and other organizations who promote the safe use of natural refrigerants such as propane and CO₂, will continue to improve upon the standards, guidelines, and training programs.... working towards continual improvement to safety. And any costs of safety measures required by codes and standards are already included in the first cost and operating costs of all US operating ammonia systems.

But the forever changing, unknown, and expansive regulations are an added, but unnecessary cost to Americans whose food supply is driven by ammonia refrigeration. Plants that currently are required to comply with PSM/RPM spend an estimated \$80,000 - \$150,000 just to create a "starting" plan. Plants then spend an estimated \$50,000 per year to account for the reoccurring costs of 3-year compliance audits, 5-year process hazard analysis, management of change and operation procedures development, etc.

Although plants with ammonia charge sizes less than 10,000 do not require PSM/RPM compliance, these “non-RPM” plants still spend similar annual amounts trying to comply the current guidance document used for EPA & OSHA’s enforcement of the General Duty Clause for ammonia plants. But there is no emphasis on large R-22, R-513A, or other synthetic refrigerant plants regarding General Duty Clause even though similar risk exists for these refrigeration systems.

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Regulatory Burden: Cost without Commensurate Benefit

- Additional layers (EPA GDC & RMP, OSHA GDC & PSM, state/local) raise costs - especially for smaller operators.
- Peer regions (EU, LatAm) deploy ammonia widely with fewer overlapping mandates.
- Maintain core safety; streamline duplicative or disproportionate requirements.
 - Ammonia Reg's have been overdone!



No other country in Europe or Latin America deploys additional state and federal regulatory burdens on ammonia refrigeration on top of their requirements to follow that country's standards.

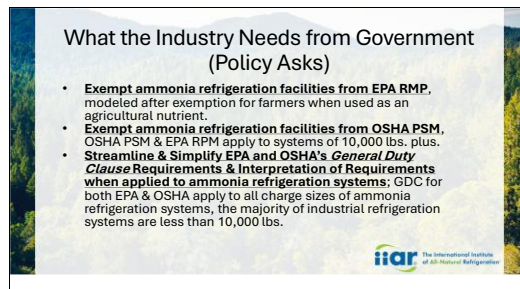
The large amount of paperwork necessary to attempt to comply with many additional USA federal and state regulations raises costs for cold storage systems, the majority using ammonia, and becomes an exceptional burden for smaller operators, the backbone of American business.

We overwhelmingly want to maintain core safety through continually improved standards and building codes for ammonia refrigeration.

However, we need the support of the federal and state government and its agencies to reduce and balance the regulatory burden

which adds significant costs without proven commensurate benefit. Look only to the Produce Industry that also heavily uses ammonia refrigeration systems, where these regulations make our US grown produce more expensive than those imported.

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What the Industry Needs from Government (Policy Asks)

- **Exempt ammonia refrigeration facilities from EPA RMP,** modeled after exemption for farmers when used as an agricultural nutrient.
- **Exempt ammonia refrigeration facilities from OSHA PSM,** OSHA PSM & EPA RMP apply to systems of 10,000 lbs. plus.
- **Streamline & Simplify EPA and OSHA's *General Duty Clause* Requirements & Interpretation of Requirements when applied to ammonia refrigeration systems;** GDC for both EPA & OSHA apply to all charge sizes of ammonia refrigeration systems, the majority of industrial refrigeration systems are less than 10,000 lbs.

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So, what is the cold storage and industrial refrigeration industry asking of the government? The following slides and bullets highlight the most important changes needed to reduce the costs of industrial refrigeration for all Americans. We cannot go into detail on every item, but we feel that all these requested changes are reasonable, responsible, and highly possible.

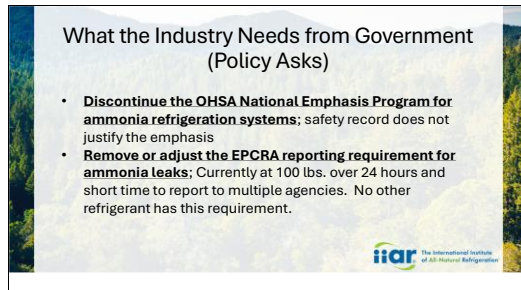
OSHA's PSM and EPA's RPM programs are meant to provide regulations for chemical accident prevention, and ammonia, because of its toxicity, is one chemical on the regulatory list. The majority of industrial refrigeration systems in the USA contain less than 10,000 lbs. So, this regulation applies to a limited number of systems. Since all ammonia refrigeration systems are still subject to the EPA and OSHA General Duty Clause, there is no need to target a limited number of facilities with RPM & PSM programs that are extremely costly for both the

government and for industry with no data to support that 10,000+ lb. plants are safer than smaller charge plants. Federal exemption from the RPM exists for ammonia held by a farmer for use as an agricultural nutrient, although all farms are still subject to the General Duty Clause. **(Similar comments apply to Cal/OSHA and CalEPA regulations regarding ammonia refrigeration systems – and we appreciate the support of CARB in assisting IIAR and our industry to work with Cal/OSHA and CalEPA.)**

Proper design, hazard assessments, maintenance, and preparation to prevent releases and minimize their consequences are the core of the General Duty Clause. The IIAR standards cover in extreme detail the design, operation, and maintenance requirements necessary for a safe system that prevents releases and minimizes their consequences. And existing and new systems must adhere to these standards which are required by the building codes. So, the intent of the GDC is already covered for all ammonia refrigeration systems, something not in existence for any other synthetic refrigerant. However, the Guidance document used for GDC enforcement treats facilities as though they are regulated like PSM/RMP, which as just noted is an extreme cost with no data supporting its success. If ammonia systems are designed and maintained by industry (IIAR)

standards, which are required by codes, these systems will be inherently safe.

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What the Industry Needs from Government
(Policy Asks)

- **Discontinue the OSHA National Emphasis Program for ammonia refrigeration systems;** safety record does not justify the emphasis
- **Remove or adjust the EPCRA reporting requirement for ammonia leaks,** Currently at 100 lbs. over 24 hours and short time to report to multiple agencies. No other refrigerant has this requirement.

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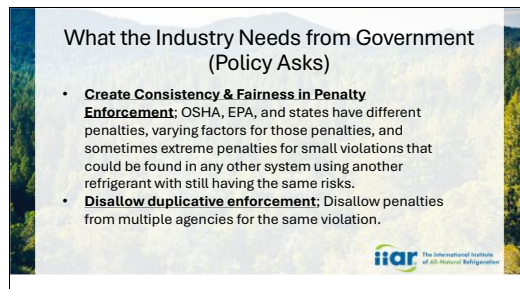
In addition to exempting ammonia systems from RPM & PSM and streamlining the General Duty Clause enforcement to focus on plants that do not follow the required codes and standards, other programs that target only ammonia refrigeration systems, and do not target other refrigerant based systems, should be discontinued or simplified.

The OSHA National Emphasis program has in recent years targeted ammonia refrigeration systems and yet has not targeted the many older and very large R-22 and R-134a refrigeration systems that have a similar risk of incident. Today, a plant can leak thousands of pounds of ozone depleting or high GWP refrigerant and no reporting requirements exist.

So, the Cold Storage industry is asking for the NEP to stop targeting ammonia plants and for the EPCRA reporting administrators to meet with our industry to better define a more useful, fair, and practical

refrigerant leak reporting system for all refrigerants.

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What the Industry Needs from Government
(Policy Asks)

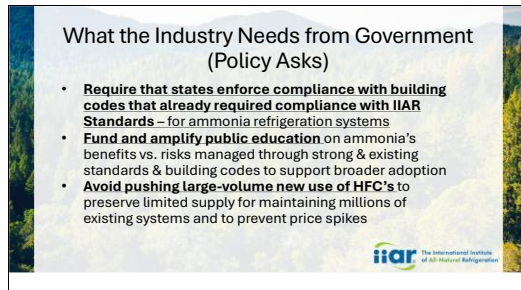
- **Create Consistency & Fairness in Penalty Enforcement:** OSHA, EPA, and states have different penalties, varying factors for those penalties, and sometimes extreme penalties for small violations that could be found in any other system using another refrigerant with still having the same risks.
- **Disallow duplicative enforcement:** Disallow penalties from multiple agencies for the same violation.

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We all agree with the concept of the General Duty Clause and strongly believe that the mandatory adherence to existing standards, as required by existing building codes, allows a facility to meet the concepts of the clause. So, when a facility is audited for GDC compliance, should a deficiency be found, the industry would like a defined penalty structure that is not duplicative across many governmental agencies (so that multiple fines are not given by multiple agencies), that the fines are fair and reasonable based on 1) whether an incident did occur, 2) whether the plant did follow the required codes and standards, and 3) the status of their processes that have been created by following the standards. For example, is the plant in the process of bringing their system up to the current safety requirements as defined necessary by IIAR-9 standard or did they just ignore them. Our members share many stories of facilities facing unwarranted, or warranted but inconsistent, audits, non-

compliance determinations, and penalty assessments.

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What the Industry Needs from Government
(Policy Asks)

- **Require that states enforce compliance with building codes that already required compliance with IIR Standards** – for ammonia refrigeration systems
- **Fund and amplify public education** on ammonia's benefits vs. risks managed through strong & existing standards & building codes to support broader adoption
- **Avoid pushing large-volume new use of HFC's** to preserve limited supply for maintaining millions of existing systems and to prevent price spikes

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Finally, our industry wants consistent adoption of the current revisions of building codes, and enforcement across all states and localities of the currently available building codes that require that the existing IIR standards for ammonia refrigeration be used for design, installation and operation of ammonia facilities. Why:

- So that local municipalities that have no building code adoption or have adopted building codes from 20+ years ago, do not leave an unsafe “free range” environment for ammonia refrigerant installations.
- Conversely, so that states cannot disqualify or overburden the use of ammonia refrigeration systems by enacting legislation that targets ammonia, requiring compliance activity above the requirement of the current standards and building codes, but does not require the same legislation for similar plants using other refrigerants.

Lastly, the Public and Government compliance regulators from Federal, State and Local level need more understanding of the exact hazards of ammonia and all refrigerants used in industrial applications, the likelihood of incidents, and their root causes. IIAR and our MOU partner organizations have and can support a greater expansion of this type of training with the assistance of the administration.

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Call to Action: Align the Cold Chain on Safe Deregulation of Ammonia

- Align warehouses with upstream F&B manufacturers, multinationals & food retail already using ammonia or CO₂.
- Support policies that lower operating cost and consumer food prices through efficient & sustainable refrigeration.

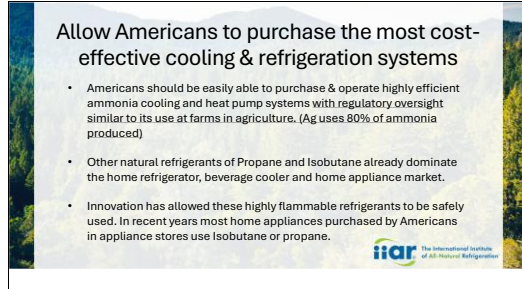


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We welcome future conversations further detailing our Industry needs from the California government and how we can support those requests for changes!

Meeting these needs of a more balanced regulation of ammonia refrigeration systems will certainly lower operating costs for the food and beverage industry and have the greatest impact in reducing American consumer food pricing.

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Allow Americans to purchase the most cost-effective cooling & refrigeration systems

- Americans should be easily able to purchase & operate highly efficient ammonia cooling and heat pump systems with regulatory oversight similar to its use at farms in agriculture. (Ag uses 80% of ammonia produced)
- Other natural refrigerants of Propane and Isobutane already dominate the home refrigerator, beverage cooler and home appliance market.
- Innovation has allowed these highly flammable refrigerants to be safely used. In recent years most home appliances purchased by Americans in appliance stores use Isobutane or propane.

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Government support in advancing other natural refrigerant use will allow Americans to purchase the most cost effective and total cost of ownership cooling and refrigeration systems.

Many lay-persons are unaware that when they buy a beer cooler, refrigerator or small cooling appliance at their local hardware store, the refrigerant will be R-610a which is isobutane, a natural refrigerant. Most new beverage cases in stores at checkout use propane as the refrigerant.

Both are shown to be more efficient than their synthetic refrigerant predecessors, but the new systems were only adopted by America in recent years, while the rest of the world started adopting their use 10+ years ago.

Why the delay in the USA? 1) Safety concerns with their use required study and code changes. 2) potentially because other parties being impacted by the change in refrigerant resisted their use and implementation.

But engineering overcame those concerns like we overcame concerns in using propane for our gas grills, gasoline under our seats in cars, and natural gas piped into our houses for heat.

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Allow Americans to purchase the most cost-effective cooling & refrigeration systems

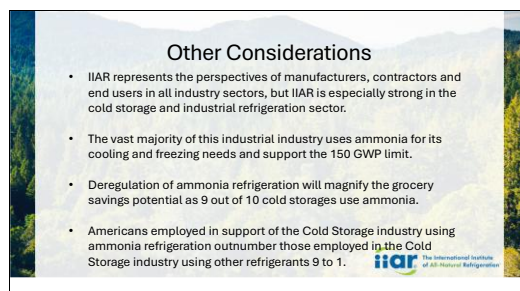
- The world adopted these more efficient refrigerants of propane & isobutane for appliances years ago. The USA lagged in its adoption.
- U.S. leads the way in innovation for ammonia refrigeration systems and has for decades. (Uniquely American)
- Let's lead the way for America to use ammonia for much more of its cooling and heat-pump needs.

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America leads the way for usage and innovation for ammonia refrigeration systems. Industrial ammonia refrigeration facilities are uniquely American, although ammonia's use is rapidly expanding in Europe for many industries even outside of the Cold chain, such as comfort cooling in large facilities such as airports.

Meeting the needs of our industry by the US and state governments will allow America to continue its leadership in ammonia refrigeration.

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Other Considerations

- IIAR represents the perspectives of manufacturers, contractors and end users in all industry sectors, but IIAR is especially strong in the cold storage and industrial refrigeration sector.
- The vast majority of this industrial industry uses ammonia for its cooling and freezing needs and support the 150 GWP limit.
- Deregulation of ammonia refrigeration will magnify the grocery savings potential as 9 out of 10 cold storages use ammonia.
- Americans employed in support of the Cold Storage industry using ammonia refrigeration outnumber those employed in the Cold Storage industry using other refrigerants 9 to 1.

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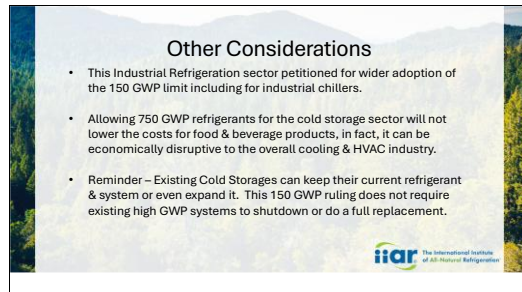
Our main points are..... Ammonia is the major refrigerant in cold storage applications, for good reason.

And with government support of deregulation of the over-regulated ammonia refrigeration systems, the largest impact in reducing the costs of food for Americans will be achieved.

But we want to point out some other considerations particularly

regarding the variance request to increase the allowed Cold Storage refrigerant from 150 GWP to 750 GWP.

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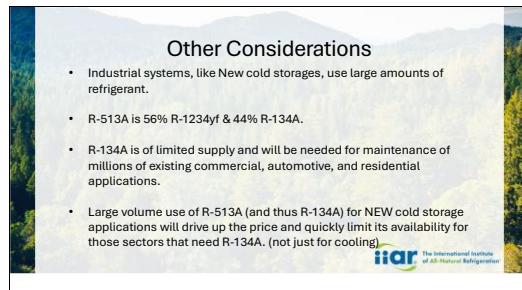


Other Considerations

- This Industrial Refrigeration sector petitioned for wider adoption of the 150 GWP limit including for industrial chillers.
- Allowing 750 GWP refrigerants for the cold storage sector will not lower the costs for food & beverage products, in fact, it can be economically disruptive to the overall cooling & HVAC industry.
- Reminder – Existing Cold Storages can keep their current refrigerant & system or even expand it. This 150 GWP ruling does not require existing high GWP systems to shutdown or do a full replacement.

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Other Considerations

- Industrial systems, like New cold storages, use large amounts of refrigerant.
- R-513A is 56% R-1234yf & 44% R-134A.
- R-134A is of limited supply and will be needed for maintenance of millions of existing commercial, automotive, and residential applications.
- Large volume use of R-513A (and thus R-134A) for NEW cold storage applications will drive up the price and quickly limit its availability for those sectors that need R-134A. (not just for cooling)

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Other Considerations

- Because the Industrial Refrigeration engineers, manufacturers and contractors that use ammonia currently supply 91% of the cold storage applications.....
- Their well-established capacity and capability clearly shows that ammonia is not the new alternative for Cold Storage and Industrial Refrigeration Applications.

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Other Considerations

- We applaud the MAHA movement and support its efforts to find chemicals in our food and environment that are causing the many severe health issues for Americans.
- We applaud the EPA's stated efforts regarding PFAS
"I have long been concerned about PFAS and the efforts to help states and communities dealing with legacy contamination in their backyards. With today's announcement, we are tackling PFAS from all of EPA's program offices, advancing research and testing, stopping PFAS from getting into drinking water systems, holding polluters accountable, and providing certainty for passive receivers. This is just a start of the work we will do on PFAS to ensure Americans have the cleanest air, land, and water," said EPA Administrator Zeldin.

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Other Considerations

PFAS – forever chemicals
 = per and polyfluorinated alkyl substances
 (organic carbon chain with fluorine atoms [simplified])

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Other Considerations					
1870	Main uses	Production ²	Direct climate/ ozone impact ³	Atmospheric breakdown to 1870-13	PFAS ⁴
HFO-1234yf (CF ₃ CF=CH ₂)	Refrigerant and HFC-1870 refrigerant blends (eg. R-454C, R-454A, R-454B, R-513A) ¹	Produced from HFC-22 feedstock (ODP 0.058) with byproducts including HFC-23 (ODP 14,700) and PFC-518 (ODP 15,600) or from CTC (ODP 0.07) feedstock ²	GWP: <1	No	Yes TFA yield 100%

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Other Considerations	
<ul style="list-style-type: none"> The two chemicals that make up R-513A, R-134a and R-1234yf are both PFAS chemicals. There is no certainty, at this time, on the current and future impacts of these man-made chemicals that exist and whose volumes continue to grow in our water and environment. However, with non-PFAS refrigerants readily available for cold storage applications, it is not necessary to take the risk of potential PFAS impacts to human health. And the burdensome costs of future clean-up. 	

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MAHA assessment report – Make Our Children Healthy Again – was released in September 2025.

Quotes from released report.

“The chemical-manufacturing industry spent roughly \$77 million on federal lobbying activities in 2024, while 60% of their lobbyists previously held federal posts. In addition, more than ten thousand chemicals listed on the EPA’s inventory are designated as confidential, and generic chemical names are used to identify them.”

“Recently analyzed confidential documents from industry leaders revealed that the PFAS industry focused on suppressing unfavorable research and distorting public discourse, effectively delaying public awareness of its dangers.”