



LIGHT COMMERCIAL SPLITS REFRIGERANT REGULATION UPDATE: FINAL EPA RULING

In late 2023, the EPA released their final ruling for the Technology Transition Program spelled out in the AIM Act. This ruling will specify the new requirements for installing new HVAC equipment with Puron Advance™/R-454B and servicing existing systems with Puron®/R-410A in the field. A breakdown of the final ruling and how it applies to different product categories is listed below.

Requirement	Final Rule - As of 12/26/23	
	Packaged	Splits
GWP	700	700
RNC Date	1/1/2025 Date of Manufacture or Import	1/1/2025 Date of Manufacture or Import
AOR New Systems Date	1/1/2025 Date of Manufacture or Import	1/1/2025 Date of Manufacture or Import
AOR Service Restrictions	Parts Only	Parts + Indoor Coil + Complete R-410A Outdoor Unit
R-410A Inventory Sell-Through	Three-Year	One-Year (New) Indefinite (Service)

NOTABLE HIGHLIGHTS

Takes effect January 1, 2025:

On this date, all newly manufactured Light Commercial splits must be designed for use with a lower GWP refrigerant.

Last date of manufacture or import for R-410A splits:

Manufacturing or importing of new Light Commercial splits using R-410A is to be discontinued after December 31, 2024.

One-year sell-through for Light Commercial split systems:

You can install existing inventory of new, pre-2025 R-410A split systems until December 31, 2025, as long as all components were manufactured prior to January 1, 2025.

Service provisions:

Any component of an R-410A split including a condensing unit or a fan coil can be serviced at any time as long as the servicing does not qualify as a new system installation per the new ruling. The following situations would qualify as a new system installation and would require new R-454B product: 1) Assembling a system for the first time from new or used components; 2) Increasing the cooling capacity, in BTU per hour, of an existing system; or 3) Replacing 75% or more of evaporators (by number) and 100% of the compressor racks, condensers, and connected evaporator loads of an existing system.

Individual parts designed for Puron/R-410A, including complete condensing units, can be replaced with like parts manufactured after December 31, 2024 provided they are labeled "for service only". Light Commercial splits (three phase, above 65,000 BTU) are not subject to the "Outdoor Unit With No Match" (OUWNM) test procedure that Residential splits (65,000 BTU and below, single and three phase) must follow.

Please note state requirements in CA, WA and potentially others, will not allow the "for service" provision that allows the replacement of a complete outdoor unit after 12/31/2025. Consult your local code requirements.



SYSTEMS vs. PRODUCTS

In this final ruling, the EPA has divided the HVAC market into two categories - systems and products. The regulation requirements will differ for each of the two categories. Light Commercial splits are categorized as HVAC Systems.

HVAC SYSTEMS



DEFINITION

Any HVAC equipment where its major components are assembled into a system and charged in the field. Examples of HVAC systems include Light Commercial splits.

TIMING: LAST DATE OF INSTALL OR MANUFACTURE FOR R-410A

Last date of manufacture or import of new R-410A equipment is December 31, 2024. There will be a one-year sell-through period for these HVAC systems. Therefore, the last date of installation for a system manufactured or imported prior to December 31, 2024, will be December 31, 2025.

EXISTING R-410A SERVICE METHODOLOGY

Individual components of the system can be changed out¹. The entire system (i.e. fan coil and condensing unit) cannot be changed out at the same time for service utilizing R-410A product.

Indoor coils are considered service components and can continue to be manufactured and installed for service replacement of R-410A indoor coils. Individual components for service will be available through RC.

¹ New R-410A splits will not be allowed for service in the state of California or Washington after January 1, 2025. Please consult your local laws and regulations for further information.

FREQUENTLY ASKED QUESTIONS

HVAC SYSTEM FAQs (splits)

What is considered an “HVAC system” in this final EPA ruling?	An HVAC system consists of all components necessary for a split air conditioner or heat pump system to operate. That means all condenser coils, compressors, expansion devices, and evaporator coils. Anything less than a total system is considered a specified component.
In a light commercial split, is my fan coil or condensing unit considered a system all by itself?	No. They are considered as components of a system because they have to be installed together on site to operate.
What is considered the date of install of a system?	The date of install will be considered as the day in which the system was assembled and charged for operation on site.
When is the last date that I can install new systems containing R-410A equipment?	December 31, 2025 ¹ will be the last day that a new system containing R-410A can be installed, however, the fan coil and condensing unit must be manufactured prior to January 1, 2025.
Can a R-410A system be serviced after December 31, 2024?	Yes, any component of an R-410A system including a fan coil or a condensing unit ¹ can be serviced at any time as long as the entire system is not replaced. It must be labeled “For Service Only”.
Can all components of an R-410A system be replaced at one time?	No. If all the components of a R-410A system need to be replaced at one time, then the system is considered a new installation and must contain a lower GWP refrigerant.
Can the capacity of an R-410A system be increased via service after January 1, 2025?	Any service that would increase the capacity of the system greater than the original design would be considered changing the system to a new system and would require the use of lower GWP refrigerants.
Who is responsible for ensuring that new systems will be installed using low GWP refrigerants after January 1, 2025?	The party or parties responsible for the installation and charging of the system will be responsible for ensuring the system is designed with equipment using lower GWP refrigerants.
Do these requirements apply to any system installed outside of the United States?	No, this ruling currently only applies to equipment installed inside of the United States and its territories.

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