



Breaking News

Rheem Government Affairs

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New York HFC Regulation Final Rule

GWP Limits for HVACR and Water Heating Applications

On December 24th, the New York State Department of Environmental Conservation amended 6 NYCRR Part 494, Hydrofluorocarbon Standards and Reporting, a regulation that includes prohibitions, reporting, and labeling for HFCs. It sets new GWP limits for applications that use HFCs, including air conditioning, refrigeration, and water heating equipment. The effective date of the rule is January 9th, 2025.

Summary:

- NY DEC establishes a GWP₂₀ limit of 10 for “Other HVAC,” which includes factory-charged heat pump water heaters and heat pump pool heaters, with a compliance date starting 1/1/2027 for residential and 1/1/2034 for commercial, based on the date of sale or purchase.
- The rule references the GWP₁₀₀ limit of 700 established by the EPA for split system AC and heat pumps, with a compliance date of 1/1/2026 based on the date of installation and a sell-through for packaged products until 1/1/2027. It also sets a GWP₂₀ maximum of 10 with a compliance date of 1/1/2034, making this the first “ultra-low GWP” regulatory limit for AC and heat pumps.
- Components are not included in the prohibitions; however, NY DEC considers the replacement of an outdoor condensing unit to be a “new installation,” which is prohibited as of the compliance date unless using low-GWP refrigerant.
- NY DEC also sets forth prohibitions on the sale of bulk refrigerants, restricting R-410A by 2030 and other historically used refrigerants by 2033. It further prohibits the sale of bulk refrigerants with GWP₂₀ ≥ 1,600 from 1/1/2040.
- Recordkeeping, labelling, and reporting requirements will apply to manufacturers and distributors of bulk refrigerant and HVACR equipment that use HFCs.

With this regulation, NY DEC establishes the most aggressive GWP limits in the U.S. Refrigerant options with GWP₂₀ below 10 are hydrocarbons, CO₂, and pure hydrofluoroolefins. Hydrocarbons such as R-290 (propane) are largely prohibited in the necessary charge quantities by safety standards and building codes.

Key Takeaways

NY DEC finalizes GWP limits for HVACR and establishes first-of-its-kind limits for HPWH.

The NY rule is the first to contain ultra-low GWP limits for AC, heat pumps, and commercial refrigeration.

The regulation references 20-year GWP values (GWP₂₀), which differ from the 100-year GWP values used by other regulating bodies.

The final rule effectively prohibits the use of all HFCs in new equipment by 2034 and establishes GWP restrictions on bulk refrigerants used for service of existing equipment.

For more information, see the rulemaking page: <https://dec.ny.gov/environmental-protection/climate-change/statutes-regulations-policies/part-494/495-requirements-for-suppliers-and-owners-or-operators>



Select GWP Limit Restrictions on HFCs by Application*

Self-Contained or Packaged Equipment Type	Limit	Prohibition Date
Residential and light commercial air conditioning and heat pumps, including air-to-water heat pumps	≤ 700 GWP ₁₀₀	January 1, 2026
	≤ 10 GWP ₂₀	January 1, 2034
VRF Systems	≤ 700 GWP ₁₀₀	January 1, 2026
	≤ 10 GWP ₂₀	January 1, 2030
Other residential HVAC, including HPWH, HPPH	≤ 10 GWP ₂₀	January 1, 2027
Other commercial HVAC, including HPWH, HPPH	≤ 10 GWP ₂₀	January 1, 2034
Remote condensing units with refrigerant charge ≥ 50 lbs	≤ 580 GWP ₂₀	January 1, 2026
Remote condensing units with refrigerant charge < 50 lbs	≤ 943 GWP ₂₀	January 1, 2026
Remote condensing units (all)	≤ 10 GWP ₂₀	January 1, 2034
Standalone units – medium temperature	≤ 150 GWP ₁₀₀	January 9, 2025
Standalone units – low temperature	≤ 150 GWP ₁₀₀	January 9, 2025
Standalone units (all)	≤ 10 GWP ₂₀	January 1, 2034
Cold storage warehouses with refrigerant charge ≥ 50 lbs	≤ 580 GWP ₂₀	January 1, 2026
Cold storage warehouses with refrigerant charge < 50 lbs	≤ 943 GWP ₂₀	January 1, 2026
Cold storage warehouses (all)	≤ 10 GWP ₂₀	January 1, 2034
Industrial process refrigeration with refrigerant charge ≥ 50 lbs	≤ 580 GWP ₂₀	January 1, 2026
Industrial process refrigeration with refrigerant charge < 50 lbs	≤ 943 GWP ₂₀	January 1, 2026
Industrial process refrigeration (all)	≤ 10 GWP ₂₀	January 1, 2034

***Note distinction based on Products vs Systems:**

Self-Contained or Packaged Equipment Type (Products): Effective one year after the prohibition date, no person may sell, distribute, or purchase in New York State any product that uses a prohibited substance. *This limited sell-through is more restrictive than that of EPA and expires on Jan 1, 2027 for most AC/HP.*

Field-Charged or Split System Equipment Type (Systems): No person may install a field-charged system in New York State that uses a prohibited substance as listed in the tables after the prohibition date indicated.



GWP Limit Restrictions on Bulk Virgin HFCs

Limit	Prohibition Date	Common Refrigerants in Scope
≤ 2,200 GWP ₁₀₀	January 9, 2025*	R-404A, R-507A
≤ 1,500 GWP ₁₀₀	January 1, 2030	R-410A, R-407A/C/F
≤ 750 GWP ₁₀₀	January 1, 2033	R-134a, R-448A, R-449A
< 1,600 GWP ₂₀	January 1, 2040	R-32, R-454B, R-513A

*Note that NY DEC is expected to grant an enforcement delay for the provision with the immediate prohibition date of Jan. 9, 2025.

Registration, Recordkeeping, and Reporting

Requirement	Applies To	Effective Date
Register with the NY DEC	Distributors who bring HVACR equipment intended to use HFCs into the state of New York.	June 1, 2025
Register with the NY DEC	Suppliers who bring into the state of New York bulk HFC refrigerant for the service and repair of HVACR equipment.	June 1, 2025
Annually report total quantity of HFCs supplied to New York state in the prior year	Distributors and suppliers	March 31 each year, beginning in 2026
Annually report total quantity of HFCs collected in New York state for reclamation or destruction	Distributors and suppliers	March 31 each year, beginning in 2026

