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April 8, 2020

The Honorable John Barrasso
Chairman
Senate Environment and Public Works
Committee
410 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Tom Carper
Ranking Member
Senate Environment and Public Works
Committee
410 Dirksen Senate Office Building
Washington, DC 20510

Dear Chairman Barrasso and Ranking Member Carper,

We are writing in response to the Senate Environment and Public Works Committee's request for comments on S. 2754, the American Innovation and Manufacturing (AIM) Act.

Hudson is a small business that started in a garage in 1990 and is now the nation's largest refrigerant reclamation company, employing close to 300 people. We create considerable value for our customers by returning over \$40 million annually to contractors and system owners, many of whom are small businesses, to compensate them for recovering the refrigerant that is in the installed base and making it available for reuse. By buying used, contaminated refrigerant and returning it to the purity standard of newly produced refrigerant, reclaimed refrigerant can be reused in the aftermarket. Without companies like Hudson Technologies, system owners would be forced to prematurely replace their systems, at an extremely large capital outlay, when older refrigerants, like CFCs and HCFCs, are no longer produced.

The AIM Act would authorize the Environmental Protection Agency (EPA) to implement an orderly phasedown of the production and consumption of hydrofluorocarbons (HFCs) over a 15-year period. This phasedown reflects the reality of global markets moving away from HFCs and will encourage continued American investment in technologies to replace HFCs and in our refrigerant reclamation infrastructure. Prior phasedowns of CFCs and HCFCs have been economic success stories, enabled in large by the reclamation industry.

We are particularly supportive of the AIM Act's direction to the EPA to increase opportunities for refrigerant reclamation, a wholly domestic industry that prevents the U.S. market from being flooded by cheap, virgin refrigerant from China to meet the needs of the aftermarket. The AIM Act also reduces regulatory uncertainty by authorizing EPA to harmonize refrigerant management, ensuring a single Federal program to oversee both HFCs and ozone-depleting substances. As was the case with previous phasedowns, the HFCs phasedown in the AIM Act will allow for existing units to remain in service until the end of their usefulness, creating an aftermarket for phased-out refrigerants that will be met in part by the domestic reclamation industry.

The AIM Act will ensure that the United States remains a global leader in the heating, ventilation, and air conditioning industry and the reclamation industry is standing by to ensure we have a domestic supply of refrigerants throughout the HFC phasedown and beyond. We look forward to working with you towards the enactment of the AIM Act.

Sincerely,



Kevin J. Zugibe,
Chairman, CEO

KZ/

Cc:

The Honorable James M. Inhofe
The Honorable Shelley Moore Capito
The Honorable Kevin Cramer
The Honorable Mike Braun
The Honorable Mike Rounds
The Honorable Dan Sullivan
The Honorable John Boozman
The Honorable Roger F. Wicker
The Honorable Richard Shelby
The Honorable Joni Ernst

The Honorable Benjamin L. Cardin
The Honorable Bernard Sanders
The Honorable Sheldon Whitehouse
The Honorable Jeff Merkley
The Honorable Kristen Gillibrand
The Honorable Cory A. Booker
The Honorable Edward Markey
The Honorable Tammy Duckworth
The Honorable Chris Van Hollen

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