



From 50 lbs to 15 lbs:

HOW HVAC/R BUSINESSES CAN PREPARE FOR
THE EPA'S 2026 REFRIGERANT TRACKING SHIFT

A COMPLIANCE GUIDE FOR CONTRACTORS, TECHNICIANS, AND EQUIPMENT OWNERS



Executive Summary

Starting January 1, 2026, the U.S. Environmental Protection Agency (EPA) is significantly lowering the refrigerant charge threshold for appliance tracking and leak-repair compliance. Previously only systems containing CFCs / HCFCs with 50 lbs or more were impacted. That same level of scrutiny now extends to systems containing 15 lbs or more of HFCs or substitute refrigerants with a Global Warming Potential (GWP) over 53.

This regulatory shift brings hundreds of thousands of additional systems under federal compliance requirements for the first time, including widely used commercial HVAC and refrigeration units.

Systems that once flew under the radar must now be logged, inspected, and monitored for leaks—and businesses that fail to comply risk hefty fines and operational disruption.

FMHero was built to make this transition seamless. With automated tracking, EPA-ready documentation, and built-in leak monitoring workflows, FMHero ensures your business is ready—not just for 2026, but for the future of refrigerant management.



The Regulatory Shift Explained

What's Changing?

The EPA, under the AIM Act and in the spirit of the Kigali Amendment, is expanding refrigerant management rules to cover appliances with:

- **≥15 lbs of HFC refrigerant or substitutes with GWP > 53.**

AS OF **JANUARY 1, 2026**, THESE SYSTEMS MUST COMPLY WITH:

- Leak rate calculations
- Repair timelines
- Chronic leak reporting
- Three-year documentation
- Reclamation tracking standards

Why the Change?

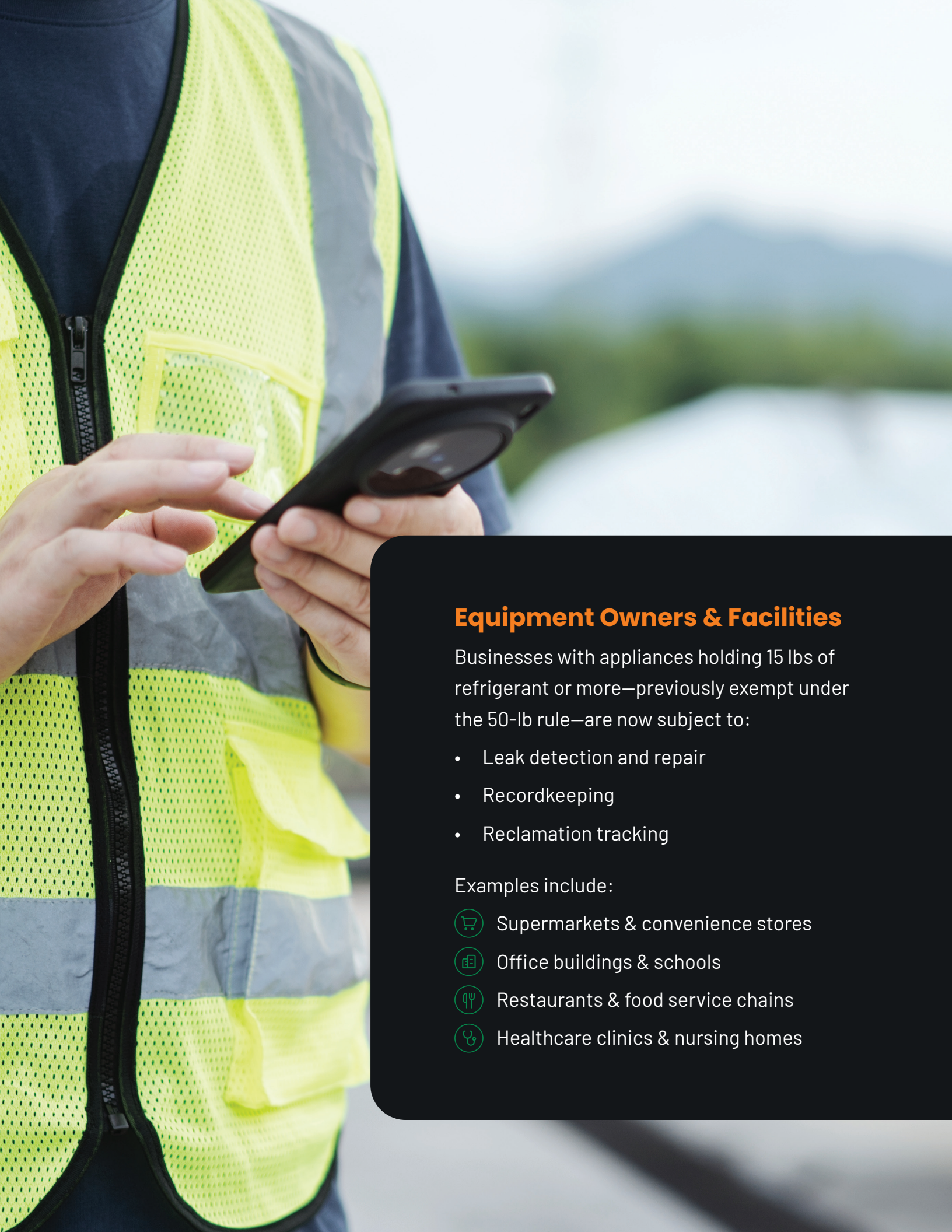
High-GWP refrigerants like R-410A, R-404A, and R-134a are potent climate pollutants—some with over 1,000x the warming impact of CO₂.

While larger systems have long been regulated, smaller commercial systems collectively account for massive annual emissions. By expanding the scope, the EPA aims to close the compliance gap, accelerate HFC phasedown goals, and cut avoidable emissions.





**Who Is
Impacted?**







Equipment Owners & Facilities

Businesses with appliances holding 15 lbs of refrigerant or more—previously exempt under the 50-lb rule—are now subject to:

- Leak detection and repair
- Recordkeeping
- Reclamation tracking

Examples include:

-  Supermarkets & convenience stores
-  Office buildings & schools
-  Restaurants & food service chains
-  Healthcare clinics & nursing homes



Contractors & Technicians

HVAC/R professionals must now:

- Track refrigerant charge for more systems
- Perform EPA-compliant inspections
- Calculate leak rates
- Log repairs
- Document and report chronic leaks

This means more paperwork, tighter timelines, and greater legal exposure—but also more value-added service opportunities.

Refrigerant Suppliers

All certified reclaimed HFCs sold after Jan 1, 2026 must contain no more than 15% virgin HFC by weight. Distributors must now offer reclamation tracking transparency to their buyers.

Compliance Requirement at a Glance

ODS (CFCs / HCFCs ≥50lbs)

CURRENT RULE

REQUIREMENT	CURRENT RULE	FMHERO SUPPORT
Appliance Tracking	Required	Auto-tagging, cloud inventory
Leak Threshold: Comfort Cooling Refrigeration Industrial Process	≥10% leak loss ≥20% leak loss ≥30% leak loss	Leak rate calculations & alerts
Chronic Leak Reporting	Required	One-click EPA report export
Recordkeeping	3 years	Secure, searchable digital storage
Certified Reclaim	Must meet AHRI-700 standards <i>Not capped at 15% virgin.</i>	Track supplier data & flag violations

HFCs (≥15 lbs, GWP > 53)

CURRENT vs. NEW (2026)

REQUIREMENT	CURRENT RULE (BEFORE 2026)	NEW RULE (JAN 2026)	FMHERO SUPPORT
Appliance Tracking	Not required	Required	Auto-tagging, cloud inventory
Leak Threshold: Comfort Cooling Refrigeration Industrial Process	Not regulated under 608	≥10% leak loss ≥20% leak loss ≥30% leak loss	Leak rate calculations & alerts
Leak Repair Timeline	Not regulated	30 days to repair or retire plan	Repair workflows & scheduling
Chronic Leak Reporting	Not required	Required for all ≥15 lbs	One-click EPA report export
Recordkeeping	Not required	3 years	Secure, searchable digital storage
Certified Reclaim	Not required	≤15% virgin HFC by weight <i>Must meet AHRI-700 purity standards.</i>	Track supplier data & flag violations
Automatic Leak Detection ≥1500 lbs, GWP > 53	Not required	Required: • New equipment -> within 30 days of install. • Existing (2017-2025) ->retrofit by Jan 1, 2027	Leak rate calculations & alerts
Servicing with Reclaimed Refrigerant	Not required	Required Jan 1, 2029 for supermarkets, refrigerated transport, ice makers	FSO (Field Service Order) Management

*Excluding residential and light commercial appliances

Conclusion

The EPA's 2026 threshold shift marks a turning point for HVAC/R compliance. Systems once overlooked must now be tracked, logged, and reported—bringing new challenges and risks for owners, contractors, and technicians. Early adopters who prepare now can turn compliance into a competitive edge. FMHero makes it simple, with automated tracking, leak monitoring, and EPA-ready reporting that transform regulation into opportunity.

TRACK IT. CONTROL IT. PROFIT.

About FMHero

FMHero is the all-in-one refrigerant and compliance platform for the HVAC/R industry. Built for technicians, contractors, and facility managers, it delivers real-time data, automated workflows, and secure documentation. From cylinder tracking to EPA reports, FMHero streamlines compliance so you can stay audit-ready and focused on running your business.

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