

# AIM Act: What You Need to Know and Do to Comply



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# Introduction

The **American Innovation and Manufacturing (AIM) Act** represents a critical regulatory shift in how businesses handle **hydrofluorocarbons (HFCs)**, potent greenhouse gases used in refrigeration and air conditioning systems. With the impending regulatory updates taking effect at the beginning of 2026, facility managers need to understand the steps they must take to comply. This report breaks down the essential elements of the AIM Act, how to determine if your operations are affected, and the necessary actions to ensure compliance.

# 1 What's the AIM Act, and what's changing?

The AIM Act, overseen by the **U.S. Environmental Protection Agency (EPA)**, is part of a broader effort to reduce the environmental impact of HFCs by minimizing their emissions and enhancing reclamation efforts. HFCs are widely used in refrigeration, air conditioning, and fire suppression systems, but their high **Global Warming Potential (GWP)** makes them a significant contributor to climate change. Recognizing this, the EPA has introduced the **Emissions Reduction and Reclamation (ER&R) Program**, designed to tighten control over how HFCs are used, maintained, and disposed of.

Under this program, the EPA will enforce new requirements to:

- **Minimize refrigerant leaks** in appliances and systems.
- **Promote the use of reclaimed HFCs** during servicing and repair.
- **Implement automatic leak detection systems (ALDs)** on larger systems.
- **Enforce more stringent record-keeping and reporting standards.**

The **biggest change** is that the AIM Act broadens the scope of equipment covered under refrigerant management regulations. Previously, many smaller systems were exempt under **Section 608 of the Clean Air Act**, which set a high threshold for regulated refrigerant quantities. Now, the AIM Act covers systems with a full charge of **15 pounds or more** of refrigerants with a GWP greater than 53. This lower threshold means that a greater number of smaller systems—such as those found in commercial buildings, residential complexes, and even small businesses—are subject to strict regulations regarding leak detection, repairs, and reporting.

As part of this regulatory shift, the AIM Act also places new emphasis on **automatic leak detection systems** for larger systems containing **1,500 pounds or more** of HFCs. These systems must be capable of continuous monitoring to detect and report leaks in real-time. This shift toward proactive leak prevention, combined with stricter record-keeping, will help reduce HFC emissions and ensure compliance with environmental standards.

## What's the timeline?

The AIM Act will require facility managers to have compliance systems in place by **January 1, 2026**, including comprehensive refrigerant tracking, regular inspections, automatic leak detection installations, and thorough record-keeping. Failing to meet these requirements can result in penalties, so preparation is critical.

## 2 How to know if the AIM Act applies to you

### SEE ALSO | AIM Act Flow Chart: Are Your Assets Affected?

Determining whether the AIM Act applies to your facility starts with understanding the **type and size of your refrigerant systems**. The AIM Act applies to equipment using HFCs or refrigerants with a GWP greater than 53 and a refrigerant charge of 15 pounds or more. This means that even smaller systems, which previously may have been exempt, are now subject to regulation.

If your facility uses refrigerants like **R-134a, R-410A**, or other common HFCs, it's likely that you'll need to comply with the new regulations. Equipment used for **industrial process refrigeration, commercial refrigeration, or comfort cooling** are among the systems that will fall under the scope of the AIM Act.

Additionally, if you've already been managing refrigerants under **Section 608 of the Clean Air Act**, the new rules may expand the list of assets you need to track.

A [comprehensive asset inventory](#) is the first step in determining your regulatory exposure. Identify all refrigerant-containing equipment, noting the type of refrigerant used, its GWP rating, and the system's charge size. This inventory will provide a clear picture of which systems fall under the AIM Act and help you plan accordingly.

#### Does this apply to small businesses?

Even small businesses using refrigeration or air conditioning systems with more than 15 pounds of HFCs are affected. If you previously didn't have to comply with refrigerant management programs, you might now need to implement systems to track refrigerant usage and leaks. Compliance extends beyond just large-scale industrial players; all businesses with applicable systems need to prepare.

# 3 Conducting an asset inventory: what to look for and track

A **thorough asset inventory** is a critical step in ensuring AIM Act compliance. This involves cataloging every piece of refrigerant-containing equipment, documenting key details that will be required for ongoing management and reporting. Here are the key components you need to track:

- **Asset Type:** Identifying the type of system (e.g., commercial refrigeration, comfort cooling, industrial process refrigeration) is essential because the rules differ based on the asset type. Knowing whether your system is used for cooling comfort or for industrial processes affects which regulatory provisions apply.
- **Refrigerant Type:** The GWP of the refrigerant in use is a critical factor for compliance. Systems that use refrigerants with a GWP greater than 53 are subject to the AIM Act's requirements. Ensure you know the specific refrigerant type, such as R-410A, and its GWP rating.
- **System Capacity:** The charge size (measured in pounds) of your refrigerant system determines whether it meets the 15-pound threshold for regulation. Systems that exceed this threshold must comply with leak detection and repair protocols.
- **Unique Identification:** Each asset should have a unique identifier, such as a tag or asset name, to ensure accurate tracking. This simplifies maintenance, reporting, and compliance auditing.
- **Model and Manufacturer Information:** Keeping detailed records of the make and model of your equipment allows for easier troubleshooting, servicing, and future upgrades. This information is also useful when verifying compliance with EPA regulations.

Once you've gathered this information, the next step is to evaluate whether your equipment has **Automatic Leak Detection (ALD)** systems installed. ALDs are required for larger systems with a refrigerant capacity of 1,500 pounds or more, and you'll need to track specific details such as the **detection limits, alarm set points,** and **manufacturer** of the ALD device.



# 4 How to plan for operational changes to comply

Compliance with the AIM Act will require significant **operational changes** for many facilities, particularly those using large refrigeration systems or industrial cooling systems. After completing your asset inventory, it's time to start planning how you'll integrate these new processes into your operations.

The first operational change is implementing **automatic leak detection systems** for larger systems. ALDs will need to be installed and maintained regularly, ensuring they are functioning correctly and calibrated to detect refrigerant leaks at their designated alarm setpoints. It's important to partner with your service providers to schedule the installation of these devices if they aren't already in place.

You will also need to **schedule regular inspections** of your refrigerant systems. The frequency of inspections will depend on the size of your system and its refrigerant charge. Larger systems may require monthly inspections, while smaller systems might only need annual checkups. Establishing a set inspection schedule will help ensure that leaks are detected early and repairs are made within the required timeframes.

**Record-keeping** will also be a significant change. The AIM Act mandates that businesses maintain detailed logs of refrigerant usage, leaks, repairs, and reclamation efforts. This means training your staff on new record-keeping procedures and ensuring that your systems are capable of producing the necessary reports for EPA audits. Consider investing in refrigerant management software that can automate this process, reducing the likelihood of errors and missed reporting deadlines.

Finally, if your systems are not yet equipped with **ALDs** or are missing other critical components, it's time to budget for these upgrades. Partner with your service providers to ensure your systems are compliant by the 2026 deadline.



# 5 The AIM Act is just the beginning: other states enforcing refrigerant legislation

While the AIM Act sets federal regulations, states are also introducing their own refrigerant management legislation, meaning compliance may vary based on where your business operates. For instance, **New York, California, and Washington** are among the states pushing forward with stringent refrigerant management rules, some of which exceed the federal requirements set by the AIM Act.

In **New York**, amendments to **Part 494** of the Hydrofluorocarbon Standards are on the horizon. These changes will enhance reporting requirements and place prohibitions on certain HFC uses, aligning with federal rules but also introducing state-specific mandates. Businesses operating in New York will need to adjust their compliance strategies to accommodate both state and federal laws.

**Washington State** is similarly advancing its refrigerant management program, with phased regulations that will require facilities to register their refrigerant assets by size and perform regular leak inspections. The state's aggressive stance on HFC emissions means that facility managers must prepare for additional compliance steps beyond those required by the AIM Act, especially if they operate large refrigeration or industrial cooling systems.

In **California**, the introduction of **climate disclosure rules** will further impact refrigerant management practices. Companies will need to report refrigerant usage and emissions as part of their greenhouse gas disclosures, reinforcing California's commitment to environmental transparency.

These state-level regulations highlight the growing trend toward more aggressive refrigerant management policies, meaning businesses need to be proactive in their compliance efforts. By staying informed and adopting comprehensive refrigerant management systems, companies can ensure compliance with both federal and state requirements while contributing to broader environmental sustainability goals.







**Ensure AIM Act Compliance with Trakref** — The upcoming changes in refrigerant management under the AIM Act highlight the need for businesses to be more proactive than ever. With stricter regulations and compliance deadlines fast approaching, it's crucial to stay ahead of these evolving standards. Trakref, an industry-leading refrigerant management platform, offers the tools and insights you need to meet the AIM Act requirements effortlessly. From real-time tracking of refrigerant usage and leak detection to automated record-keeping and compliance reporting, Trakref streamlines the process to help you avoid costly penalties. Don't wait—review and upgrade your refrigerant management strategies today with Trakref.

Learn more about how Trakref can help you ensure compliance at <https://info.fexa.io/lp/aim-act-understand-your-risk>