

Regulatory Deadlines to Watch Out For in 2025

No matter what challenges or opportunities you might be facing in 2025, all companies are facing an increasingly complex landscape of **refrigerant management** regulations. Multiple reporting deadlines are heading your way, each of which requires careful planning and preparation.

This table provides a breakdown of the key deadlines and what practical steps you can take to ensure that your organization meets all of its reporting obligations.

Reporting Requirement	Reporting Date	Who is Affected	What to Report
EPA 608 Chronically Leaking Appliances	March 1, 2025	Systems containing 50+ pounds of Class I or II ozone-depleting refrigerants that leaked 125% or more of full charge in prior year	Leak rates, repair attempts, verification tests, and system details for chronically leaking appliances
California Air Resources Board (CARB)	March 1, 2025	California facilities with refrigeration systems using 200+ pounds of high-GWP refrigerant	Complete inventory of refrigeration systems, leak check records, service records, and calculated annual leak rates
New York Part 494	March 1, 2025	New York facilities with high-GWP refrigeration systems	HFC usage tracking, refrigerant sales data, inventory records, disposal documentation, and compliance with prohibitions on certain HFC uses
Washington State Department of Ecology	March 15, 2025 (possibly earlier)	Facilities with systems using 1,500+ pounds of high-GWP refrigerant (threshold dropping to 200 pounds in 2026)	System registration, refrigerant types and quantities, leak detection records, and maintenance history
New Jersey DEP GHG Monitoring	April 1, 2025	New Jersey facilities with systems requiring 50+ pounds of high-GWP refrigerant	GHG emissions data, system specifications, refrigerant usage, and leak rate calculations
EPA GreenChill Store Certification	Rolling	Food retailers participating in voluntary certification program	Environmental performance metrics, refrigeration system data, and sustainability practices documentation
EPA AIM Act	January 1, 2026 (Preparation required in 2025)	Systems with 15+ pounds of refrigerants with GWP >53; Systems with 1,500+ pounds require automatic leak detection	Leak repair documentation, refrigerant tracking, automatic leak detection system installation and monitoring, use of reclaimed HFCs for servicing

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