



Carrier

REFRIGERANTS: PAST, PRESENT AND FUTURE

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Seminar
SERIES



CEU/PDH CREDITS

- 0.1 CEU/1 PDH credit
- Complete the sign in sheet, providing your email address
- Instructions for accessing the Knowledge Check and obtaining credit will be emailed to you
- Link is also available on landing page
- Complete the Knowledge Check within 60 days



SESSION OBJECTIVES

At the end you should be able to:

1. Identify the refrigerant types that are ozone depleting substances
2. Distinguish the regulations that phased out ozone depleting substances
3. Identify key aspects of how refrigerant emissions are related to climate change
4. Distinguish the regulations that phase down HFC refrigerants, along with key elements of their scope and requirements
5. Associate refrigerant safety classifications listed in ASHRAE Standard 34 with appropriate letter and number designations
6. Identify various direct and indirect product-related factors that impact global warming



REFRIGERANTS

Today's Topics:

- Historical Perspective
- Refrigerants and the Environment
- Regulatory Activity
- Codes & Standards
- Planning for the Future



EARLY REFRIGERANTS

Early Refrigerants

Ammonia (NH₃)

Methyl Chloride (CH₃Cl)

Sulfur Dioxide (SO₂)

Toxic and Flammable

Toxic and Flammable

Toxic

At that time, engineering and codes had not evolved to provide for safe usage of these toxic and flammable refrigerant types.

The Cold Storage Building at the 1893 Chicago World's Fair, known as the "Greatest Refrigerator on Earth" using Ammonia caught fire, killing 13 firefighters and 4 civilians.

Several fatal accidents occurred in the 1920s due to refrigerant leaks from domestic refrigerators, and people started leaving their refrigerators in their backyards.

In 1928, Thomas Midgley, a mechanical engineer and chemist working with GM's refrigerator division, Frigidaire, began the search for a **non-toxic**, **non-flammable** and **cheap** refrigerant.

<https://www.history.com/news/cfcs-leaded-gasoline-inventions-thomas-midgley>

<https://www.firehero.org/2022/07/25/chicago-worlds-fair-cold-storage-fire/>

<https://www.energy.gov/energysaver/energy-saver-history-timeline-refrigeration-and-refrigerators>



BASIC ELEMENTS

PERIODIC TABLE OF ELEMENTS

Chemical Group Block

Atomic Number 17 35.45 Atomic Mass, u

Name **Cl** Symbol

Chemical Group Block

PubChem

1 1.0080 H Hydrogen Nonmetal																	2 4.00260 He Helium Noble Gas									
3 7.0 Li Lithium Alkali Metal	4 9.012183 Be Beryllium Alkaline Earth Me.											5 10.81 B Boron Metalloid	6 12.011 C Carbon Nonmetal	7 14.007 N Nitrogen Nonmetal	8 15.999 O Oxygen Nonmetal	9 18.9984... F Fluorine Halogen	10 20.180 Ne Neon Noble Gas									
11 22.989... Na Sodium Alkali Metal	12 24.305 Mg Magnesium Alkaline Earth Me.											13 26.981... Al Aluminum Post-Transition M.	14 28.085 Si Silicon Metalloid	15 30.973... P Phosphorus Nonmetal	16 32.07 S Sulfur Nonmetal	17 35.45 Cl Chlorine Halogen	18 39.9 Ar Argon Noble Gas									
19 39.0983 K Potassium Alkali Metal	20 40.08 Ca Calcium Alkaline Earth Me.	21 44.95591 Sc Scandium Transition Metal	22 47.867 Ti Titanium Transition Metal	23 50.9415 V Vanadium Transition Metal	24 51.996 Cr Chromium Transition Metal	25 54.93804 Mn Manganese Transition Metal	26 55.84 Fe Iron Transition Metal	27 58.93319 Co Cobalt Transition Metal	28 58.693 Ni Nickel Transition Metal	29 63.55 Cu Copper Transition Metal	30 65.4 Zn Zinc Transition Metal	31 69.723 Ga Gallium Post-Transition M.	32 72.63 Ge Germanium Metalloid	33 74.92159 As Arsenic Metalloid	34 78.97 Se Selenium Nonmetal	35 79.90 Br Bromine Halogen	36 83.80 Kr Krypton Noble Gas									
37 85.468 Rb Rubidium Alkali Metal	38 87.62 Sr Strontium Alkaline Earth Me.	39 88.90584 Y Yttrium Transition Metal	40 91.22 Zr Zirconium Transition Metal	41 92.90637 Nb Niobium Transition Metal	42 95.95 Mo Molybdenum Transition Metal	43 96.90636 Tc Technetium Transition Metal	44 101.1 Ru Ruthenium Transition Metal	45 102.9055 Rh Rhodium Transition Metal	46 106.42 Pd Palladium Transition Metal	47 107.868 Ag Silver Transition Metal	48 112.41 Cd Cadmium Transition Metal	49 114.818 In Indium Post-Transition M.	50 118.71 Sn Tin Post-Transition M.	51 121.760 Sb Antimony Metalloid	52 127.6 Te Tellurium Metalloid	53 126.9045 I Iodine Halogen	54 131.29 Xe Xenon Noble Gas									
55 132.90... Cs Cesium Alkali Metal	56 137.33 Ba Barium Alkaline Earth Me.											57 138.9055 La Lanthanum Lanthanide	58 140.116 Ce Cerium Lanthanide	59 140.90... Pr Praseodymium Lanthanide	60 144.24 Nd Neodymium Lanthanide	61 144.91... Pm Promethium Lanthanide	62 150.4 Sm Samarium Lanthanide	63 151.964 Eu Europium Lanthanide	64 157.2 Gd Gadolinium Lanthanide	65 158.92... Tb Terbium Lanthanide	66 162.500 Dy Dysprosium Lanthanide	67 164.93... Ho Holmium Lanthanide	68 167.26 Er Erbium Lanthanide	69 168.93... Tm Thulium Lanthanide	70 173.05 Yb Ytterbium Lanthanide	71 174.9668 Lu Lutetium Lanthanide
87 223.01 Fr Francium Alkali Metal	88 226.02 Ra Radium Alkaline Earth Me.											89 227.02... Ac Actinium Actinide	90 232.038 Th Thorium Actinide	91 231.03... Pa Protactinium Actinide	92 238.0289 U Uranium Actinide	93 237.04... Np Neptunium Actinide	94 244.06... Pu Plutonium Actinide	95 243.06... Am Americium Actinide	96 247.07... Cm Curium Actinide	97 247.07... Bk Berkelium Actinide	98 251.07... Cf Californium Actinide	99 252.0830 Es Einsteinium Actinide	100 257.0... Fm Fermium Actinide	101 258.0... Md Mendelevium Actinide	102 259.1... No Nobelium Actinide	103 266.1... Lr Lawrencium Actinide

Metals, solids, or have the tendency to form solids

Inert gases do not react with other elements

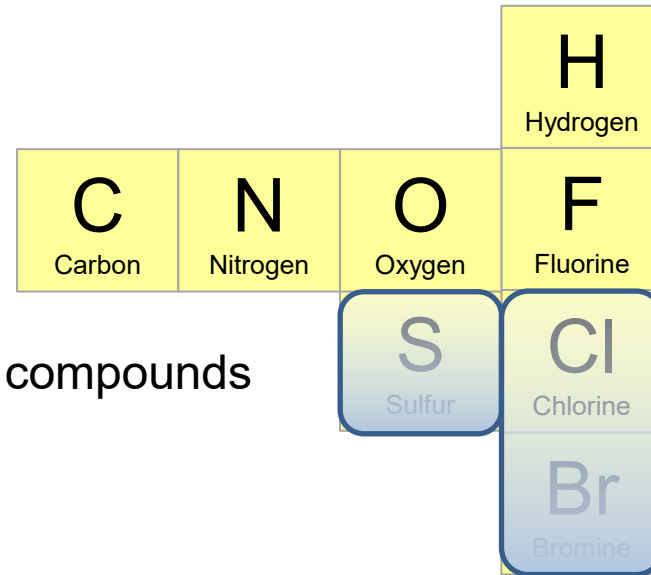
Rare, expensive elements, some are radioactive, some were more recently discovered

Unstable or toxic



REFRIGERANT COMPOUNDS

Thomas Midgley identified 8 elements that could be used to create a refrigerant molecule.



Sulfur forms toxic compounds

When chlorine and bromine atoms come into contact with ozone in the stratosphere, they destroy ozone molecules.

1930: Thomas Midgley announced the development of a new refrigerant that would later become known as R-12 or Freon-12. First of the chlorofluorocarbons, better known as CFCs.

Low toxicity, non-flammable, and relatively inexpensive to make



REFRIGERANTS

Composition Designating Prefixes

CFC-12	chlorofluorocarbons
HCFC-22	hydrochlorofluorocarbons
HFC-134a	hydrofluorocarbons
HFO-1234ze(E)	hydrofluoroolefins

Blends can be mixtures of HFC/HFO

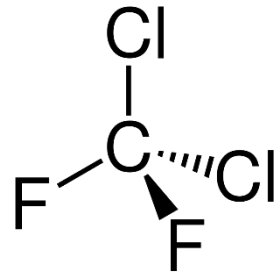
Ozone Depletion Potential (ODP)

ODP is compared to R-11, which is assigned a value of 1

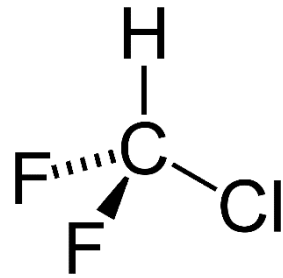
Global Warming Potential (GWP)*

GWP is compared to CO₂ with is set to 1

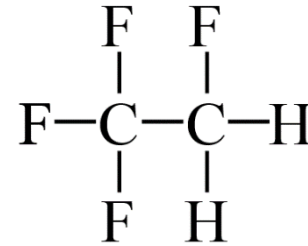
*IPCC AR4 Report for 100-year GWP levels



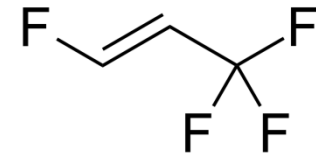
CFC-12
ODP = 0.82
GWP = 10,900
Lifetime = 102



HCFC-22
ODP = 0.04
GWP = 1810
Lifetime = 11.9



HFC-134a
ODP = 0.0
GWP = 1430
Lifetime = 13.4



HFO-1234ze(E)
ODP = 0.0
GWP = 0.79
Lifetime = 0.045



OZONE DEPLETION

Ozone layer absorbs all UV-C rays and most UV-B rays
UV-B rays penetrate skin deepest, can cause melanoma cancer
UV-C rays are harmful to the eyes

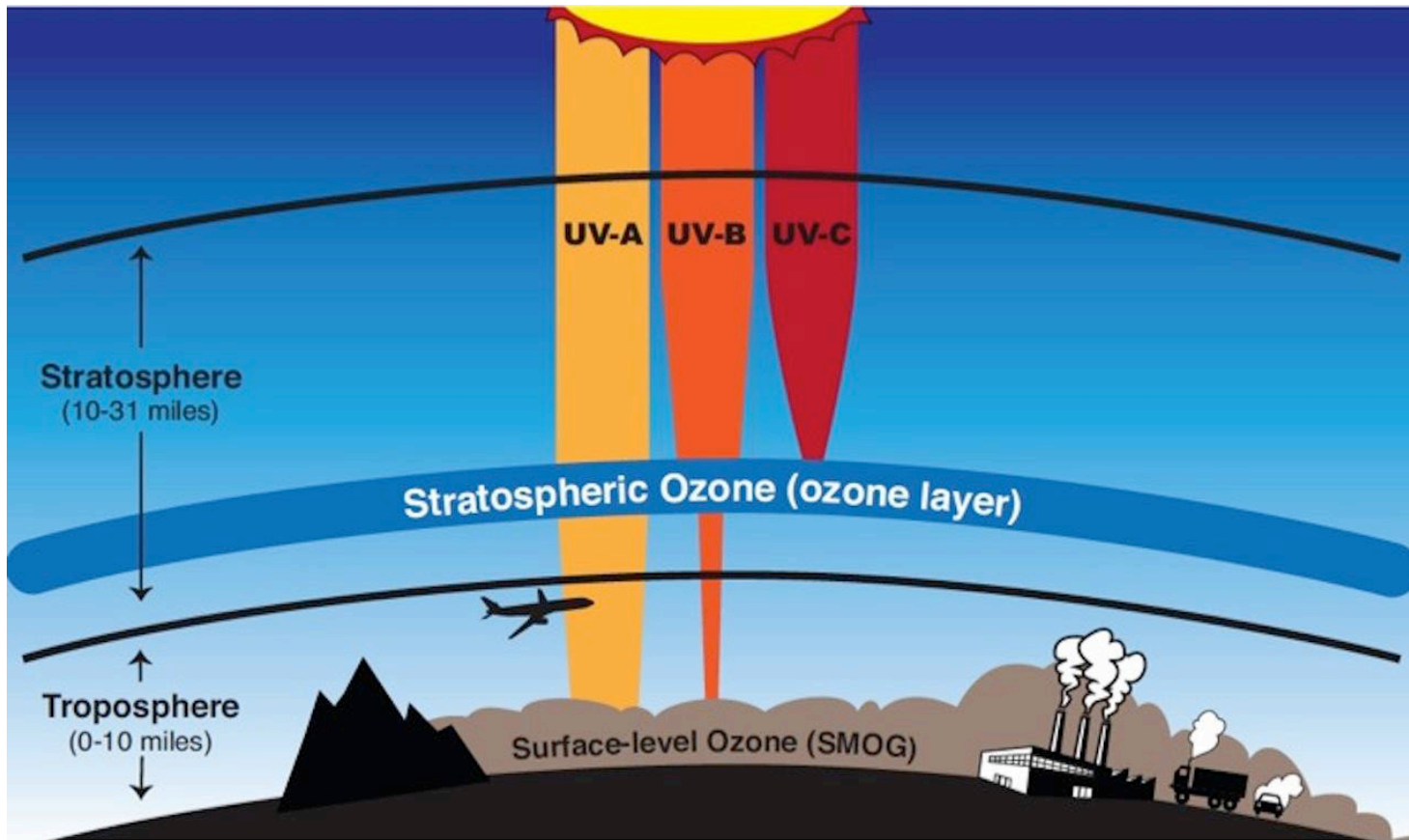


Image Credit: NASA

1974: Chlorofluorocarbons (CFCs) are determined to be ozone-depleting substances (ODS)

ODSs are carried into the Earth's stratosphere

- Cl-C and F-C bonds are very stable
- No natural process to remove them from the lower atmosphere
- ODSs release chlorine when exposed to intense UV light in the stratosphere
- Chlorine destroys ozone

Hydrochlorofluorocarbons (HCFCs) were introduced as a temporary replacement for CFCs due to their lesser potential to deplete the ozone layer

<https://www.epa.gov/ozone-layer-protection/basic-ozone-layer-science>

<https://www.nist.gov/blogs/taking-measure/refrigerants-rescue-plugging-ozone-hole>



ODS REGULATION

INTERNATIONAL



Montreal Protocol ODS Regulation

1987: Generally considered one of the most successful international agreements

Complete phase out of CFCs and HCFCs, ozone depleting substances

U.S. FEDERAL



Clean Air Act ODS Regulation

1990: Congress amended the Clean Air Act

Gave the EPA authority to regulate the use and production of ozone depleting substances.

Significant New Alternatives Policy (SNAP)

SNAP was established under Section 612 of the Clean Air Act to identify and evaluate substitutes for ozone-depleting substances.

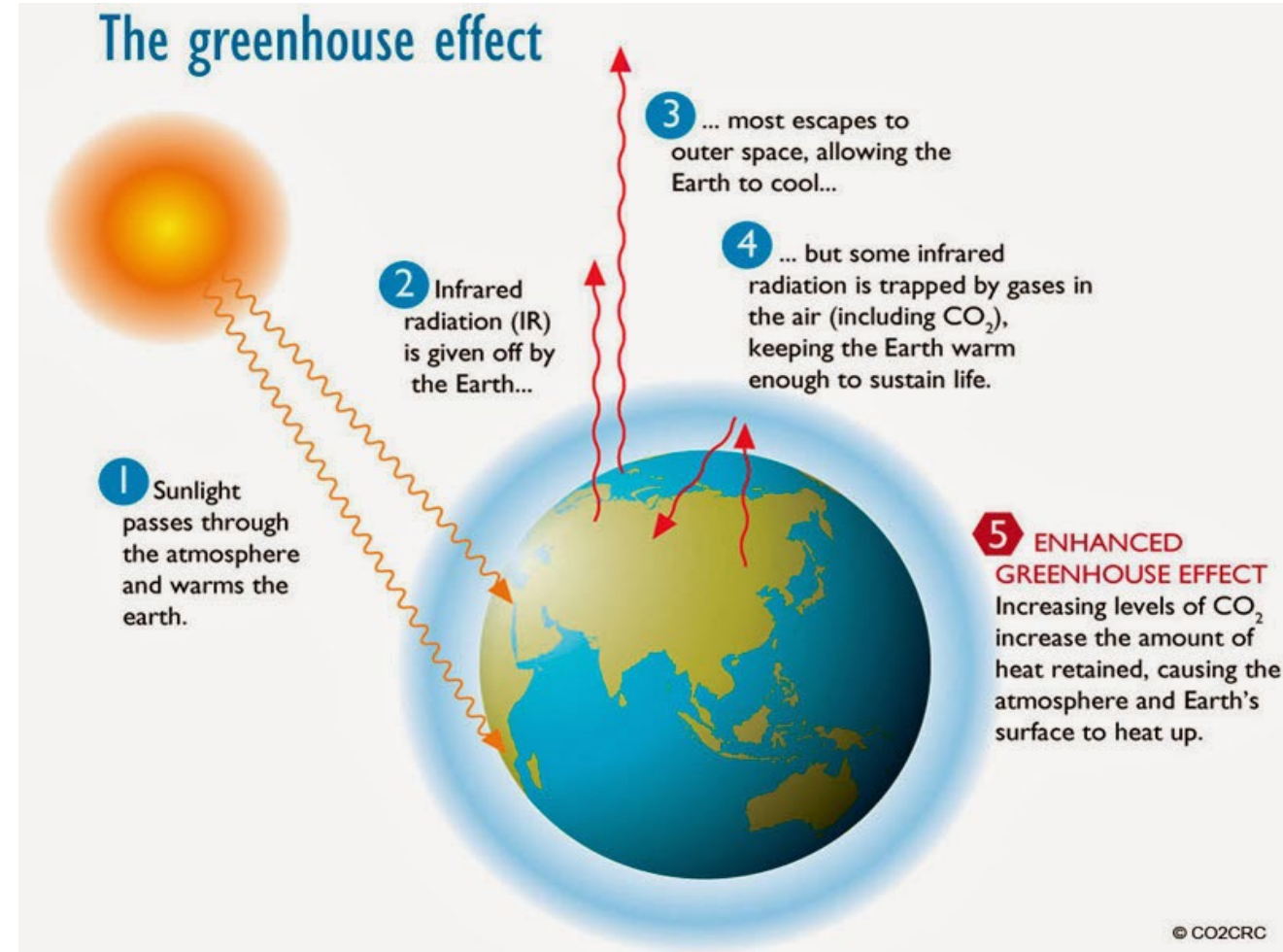
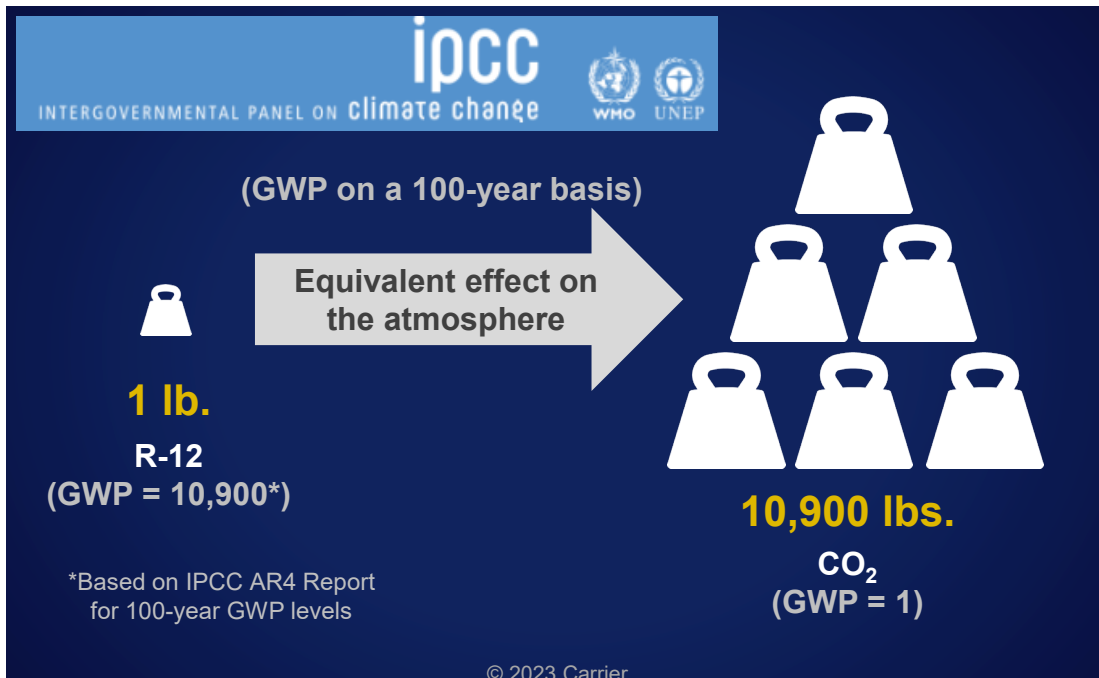
List acceptable alternatives



CLIMATE CHANGE

Intergovernmental Panel on Climate Change (IPCC)

Established in 1988 by WMO and UNEP to:
Assess available scientific information
Assess the impacts of climate change
Formulate response strategies



<https://www.ipcc.ch/about/>

http://www.co2crc.com.au/wp-content/uploads/2016/04/Generic-brochure_for-web.pdf

www.epa.gov/energy/greenhouse-gas-equivalencies-calculator

<https://www.ipcc.ch/>



HFC REGULATION

INTERNATIONAL



Kigali Amendment

HFC Phase Down Regulation

EUROPE



F-Gas Regulation

EU HFC Phase Down

U.S. FEDERAL



Clean Air Act

Significant New Alternatives Policy (SNAP) - Lists acceptable refrigerants

American Innovation and Manufacturing (AIM) Act

2020: Gave EPA authority to regulate HFC and HFC blends based on GWP

U.S. STATE



California Air Resource Board (CARB)

California SNAP implements Vacated SNAP Rules 20 & 21

State Adoption of Vacated SNAP Rule 21

11 additional states

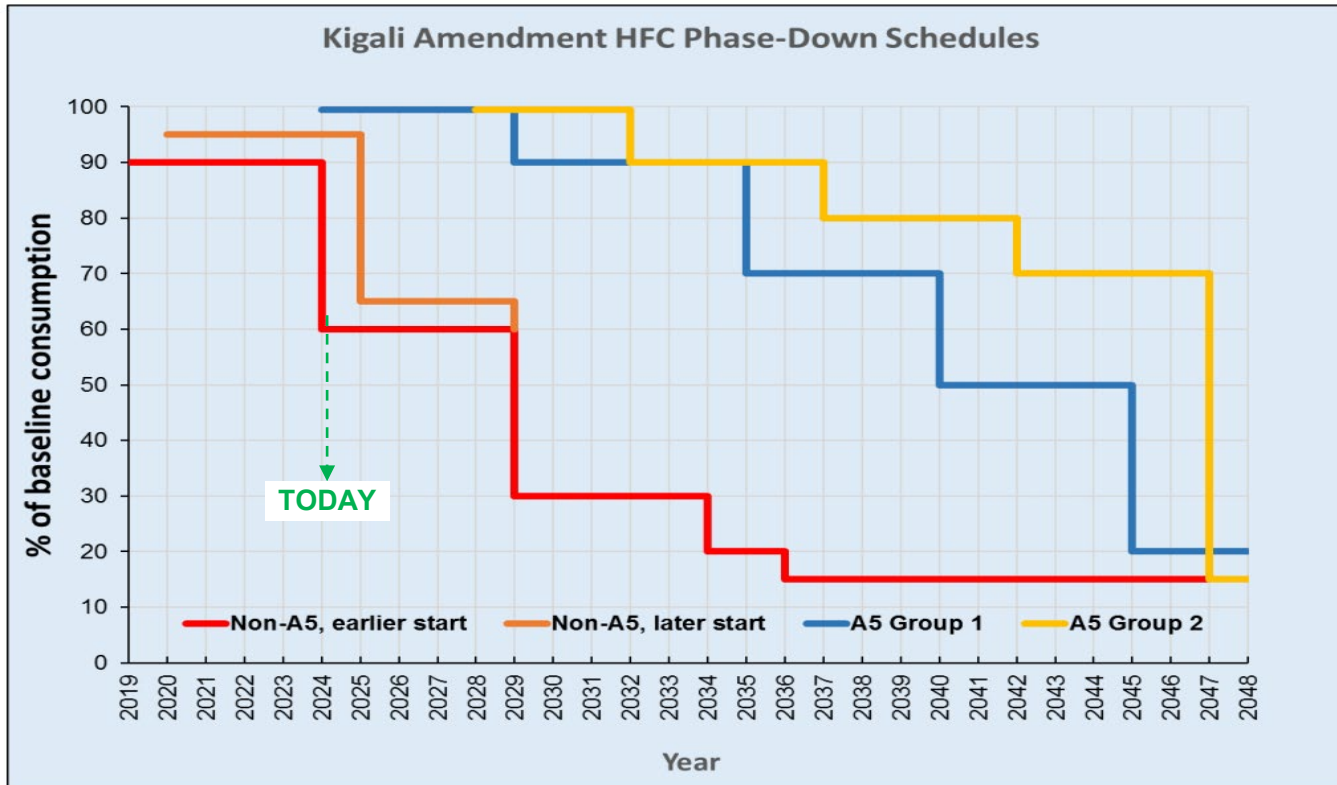


KIGALI AMENDMENT

2016: Kigali Amendment to the Montreal Protocol was adopted to phase down HFCs

Countries committed to cut production and consumption of HFCs by more than 80 percent over the next 30 years

US ratified the Kigali Amendment in 2022; 156 countries have ratified the Kigali Amendment as of Jan 2023



	A5 Group 1	A5 Group 2	Non-A5
Baseline	2020-2022	2024-2026	2011-2013
Formula	Average HFC consumption	Average HFC consumption	Average HFC consumption
HCFC	65% baseline	65% baseline	15% baseline*
Freeze	2024	2028	-
1st step	2029 – 10%	2032 – 10%	2019 – 10%
2nd step	2035 – 30%	2037 – 20%	2024 – 40%
3rd step	2040 – 50%	2042 – 30%	2029 – 70%
4th step			2034 – 80%
Plateau	2045 – 80%	2047 – 85%	2036 – 85%

*For Belarus, Russian Federation, Kazakhstan, Tajikistan, Uzbekistan 25% HCFC component of baseline and different initial two steps (1) 5% reduction in 2020 and (2) 35% reduction in 2025

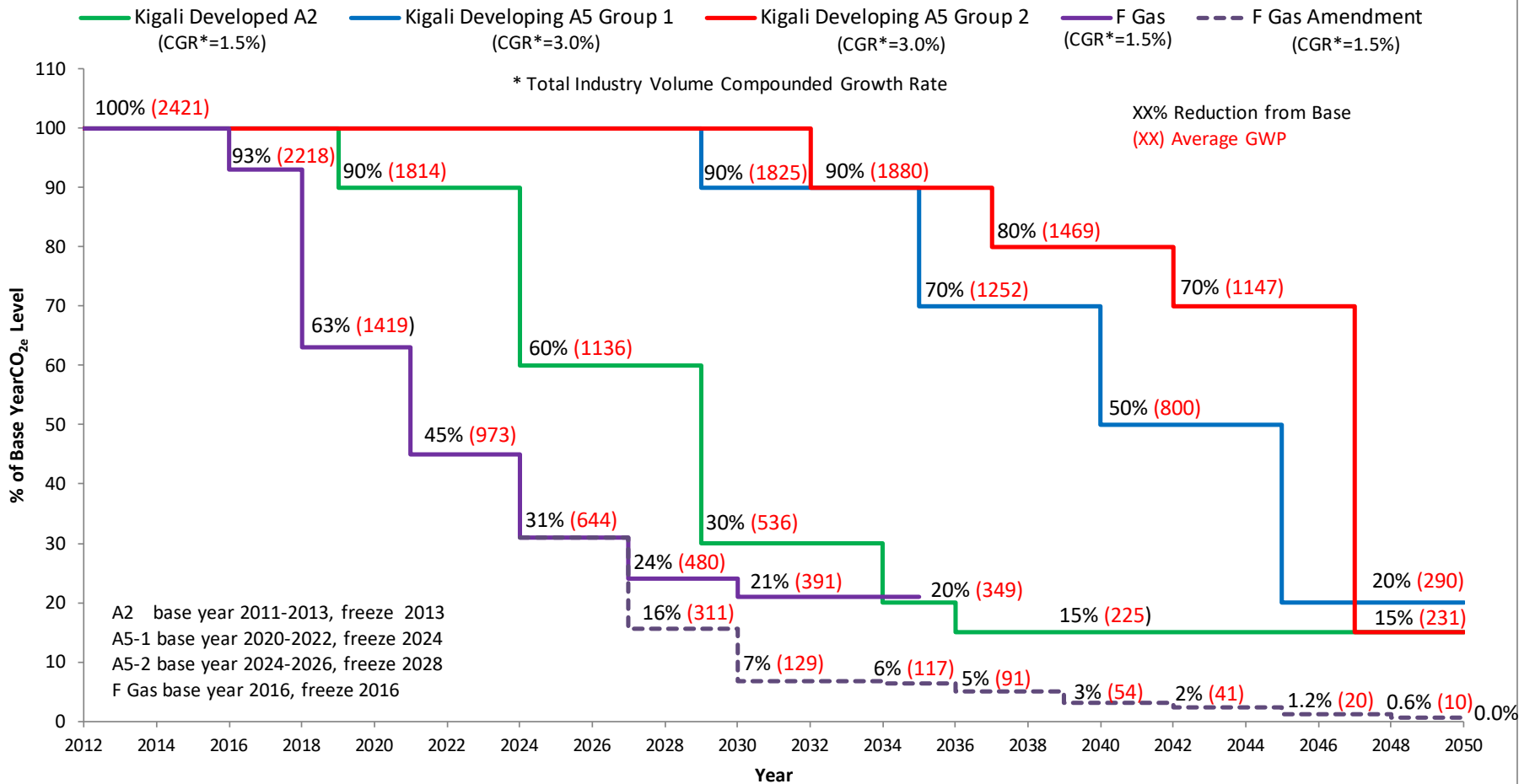
A5 Group 2: Bahrain, India, Iran, Iraq, Kuwait, Oman, Pakistan, Qatar, Saudi Arabia, United Arab Emirates

A5 Group 1: Article 5 parties not part of Group 2



EU F-GAS REGULATION

Global CO₂e (GWP) Total Industry Phasedown Requirements



New EU F-Gas Regulation provisional agreement will accelerate phase-down of F-Gas quota in 3 steps between 2024 and 2030 (25%, 10%, 5%). Final vote in Jan 2024.

Applies to European Union only (does not include UK)

In 2030, refrigerants with GWP >> 100 (R-134a, R-32, R-513A) expected to be phased out in EU.

EU goal is to reach carbon neutrality in 2050.



U.S. EPA – CLEAN AIR ACT

Significant New Alternatives Policy (SNAP)

Clean Air Act, section 612

EPA's list of acceptable refrigerant substitutes that do not present significant risk to:

- Human health &
- The environment

Criteria considered:

- Flammability
- Toxicity
- Environmental impacts on air quality & atmosphere

<https://www.epa.gov/snap/substitutes-refrigeration-and-air-conditioning>

<https://www.epa.gov/snap>



A few SNAP approved refrigerants listed by product type:

Residential & Light Commercial A/C and HP	Centrifugal & Positive Displacement Chillers
R-32	R-32
R-454B	R-454B
	R-513A
	R-514A
	R-515B
	R-1234ze(E)
	R-1233zd(E)



U.S. EPA – AIM ACT

- 2020** American Innovation and Manufacturing Act of 2020 (AIM Act) signed into law
AIM Act regulates HFCs and HFC blends based on GWP:
1. Phase down production and consumption of HFCs & HFC blends
 2. Maximize reclamation and minimize release of HFCs & HFC blends
 3. Facilitate transition to substitutes through sector-based restrictions

- 2021** AIM Act rule: Phasedown HFC production and import by 85% by 2036
Follows the phasedown schedule of the **Kigali Amendment**
EPA **SNAP Rules** provide prescriptive requirements by product type

- 2023** AIM Act: Technology Transitions Program Interim Final Rule
1. Set a maximum GWP limit on HFCs and HFC blends
 2. Prohibits manufacture and import of products that use higher-GWP HFCs
 3. Prohibits installation of new RACHP systems that use higher-GWP HFCs

Year	Consumption & Production Allowance Caps as a Percentage of Baseline
2022–2023	90 percent
2024–2028	60 percent
2029–2033	30 percent
2034–2035	20 percent
2036 & after	15 percent

Based on information as of December 2023, may be subject to change.





U.S. EPA - AIM ACT

Technology Transitions Program Interim Final Rule - December 2023

The EPA makes a distinction between “Products” and “Systems”

“A product is functional upon leaving the factory.” i.e., factory charged with refrigerant & a sealed refrigerant circuit

“Products”:

- Max GWP level threshold by subsector
- **Manufacturing date** deadline
- Sale & export prohibited three years after compliance date

“A system is assembled, and refrigerant charged in the field using multiple components”

“Systems”:

- Max GWP level threshold by subsector
- **Installation date** deadline (**new systems**)
- No restriction on maintenance or repair of existing systems

Based on information as of December 2023, may be subject to change.



U.S. EPA – AIM ACT

Technology Transitions Program Interim Final Rule – Products

Self-contained Refrigeration, Air Conditioning, and Heat Pump Products			
Subsector	Products	Global Warming Potential Limit	Manufacture and Import Compliance Date
Stationary residential and light commercial air conditioning and heat pumps	Stationary residential and light commercial air conditioning and heat pumps (e.g., window units, portable room air conditioning)	700	January 1, 2025
Chillers (as a stand-alone product)	Comfort cooling	700	January 1, 2025
Data centers, computer room air conditioning, and information technology equipment cooling	Data centers, computer room air conditioning, and information technology equipment cooling	700	January 1, 2027



U.S. EPA – AIM ACT

Technology Transitions Program Interim Final Rule – Systems

Refrigeration, Air Conditioning, and Heat Pump Systems			
Subsector	Systems	Global Warming Potential Limit	Installation Compliance Date
Stationary air conditioning and heat pumps	Residential and light commercial air conditioning and heat pump systems	700	January 1, 2025*
	Variable refrigerant flow systems	700	January 1, 2026
Chillers	Comfort cooling	700	January 1, 2025
Data centers, computer room air conditioning, and information technology equipment cooling	Data centers, computer room air conditioning, and information technology equipment cooling	700	January 1, 2027

* New systems with a GWP above 700 can be installed until January 1, 2026, so long as all components are manufactured or imported prior to January 1, 2025

Based on information as of December 2023, may be subject to change.

<https://www.epa.gov/climate-hfcs-reduction/regulatory-actions-technology-transitions>



STATE REGULATIONS

State adoption of vacated SNAP Rule 21 - restricts R-134a, R-410A & others for new chillers starting Jan 2024

California Cooling Act (SB1013 & SB1206) C.A.R.B. & 11 other states



New chillers (comfort cooling applications): GWP \leq 750 as of **January 1, 2024**.

CA, CO, DE, MA, MD, ME, NJ, NY, RI, VA, VT & WA

Research and understand the local and state laws for your area.

Projects must comply with BOTH federal & state regulations.



U.S. STANDARDS AND CODES

Refrigerant Standards

- ASHRAE 34 2022



Equipment Standards

- UL 60335-2-40 4th edition



Application Standards

- ASHRAE 15 and 15.2 2022
- ISO and EN (European Standards)

Building Codes

On a 3-year cycle

- International Building Code (IBC)
- International Fire Code (IFC)
- International Mechanical Code (IMC/UMC)
- International Residential Code (IRC)

Local Codes

May take an additional 1 to 8 years to complete

- State, county and local building codes
- Insurance codes

Model Codes approved all major A2L related proposals for the 2024 Edition of the IMC/UMC and IRC

State and local building codes need to be amended for A2L refrigerants

Completed

In Progress

Not Started



<https://www.iccsafe.org/adoptions/>



ASHRAE STANDARD 34

Refrigerant Nomenclature Basics

- 000 series:** methane-based compounds (one-carbon)
- 100 series:** ethane-based compounds (two-carbons)
- 200 series:** propane-based compounds (three-carbons)
- 300 series:** cyclic organic compounds
- 400 series:** zeotropic blend
- 500 series:** azeotropic blend (no glide)

An additional upper-case letter indicates a different ratio for the same chemical make up.

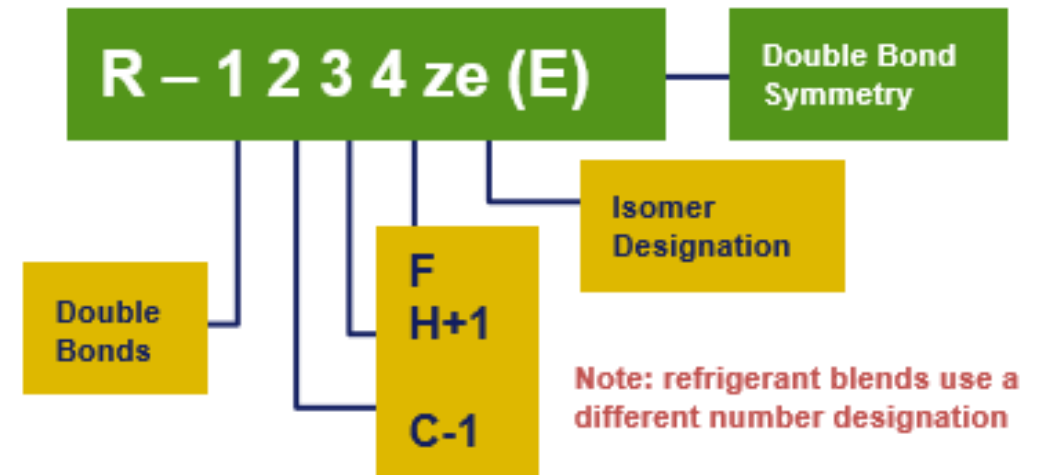
- 600 series:** miscellaneous organic compounds

600s = hydrocarbons; 610s = oxygen compounds; 620s = sulfur compounds; 630s = nitrogen compounds

- 700 series:** inorganic compounds

- 1000 series:** unsaturated organic compounds (HFOs: Hydrofluoroolefin)

An additional (E) or (Z) are called stereoisomers





ASHRAE STANDARD 34

Increasing flammability ↑

	ASHRAE Safety Classification		Example Refrigerants (Based on Flammability Class)
	Lower Toxicity	Higher Toxicity	
Higher Flammability	A3	B3	Propane (R-290), Isobutane
Flammable	A2	B2	R-152
Lower Flammability	A2L	B2L	R-454B, R-32, R-454A, R-454C, R-1234ze(E)
No Flame Propagation	A1	B1	R-410A, R-134a, R-513A, R-515B, R-1233zd(E)

Ignites very easily
Potentially Explosive



Ignites Easily
Relatively High Energy Release



“Mildly Flammable”
Difficult to Ignite
Relatively Low Energy Release
Low Flame Speed



Low Grade Coal

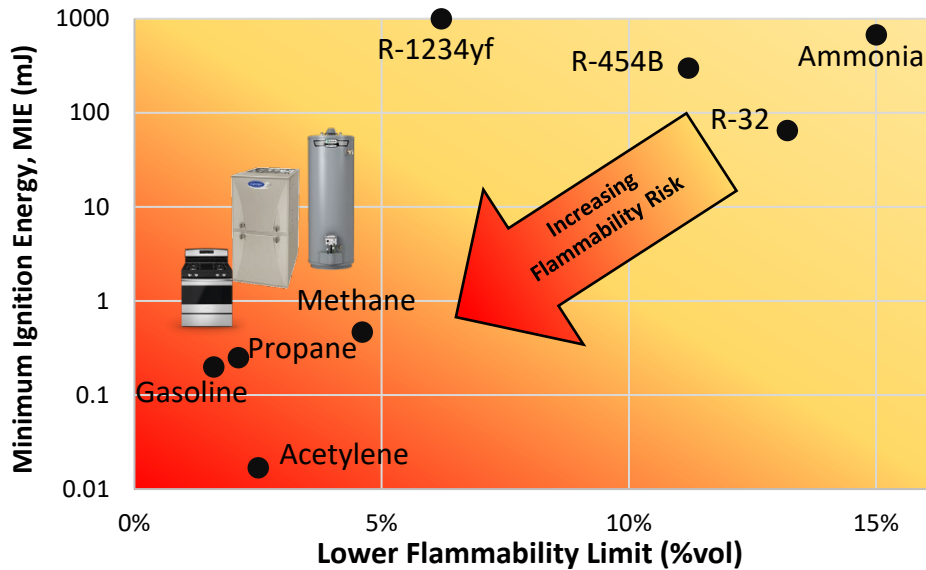
No Flame Propagation



A2L FLAMMABILITY

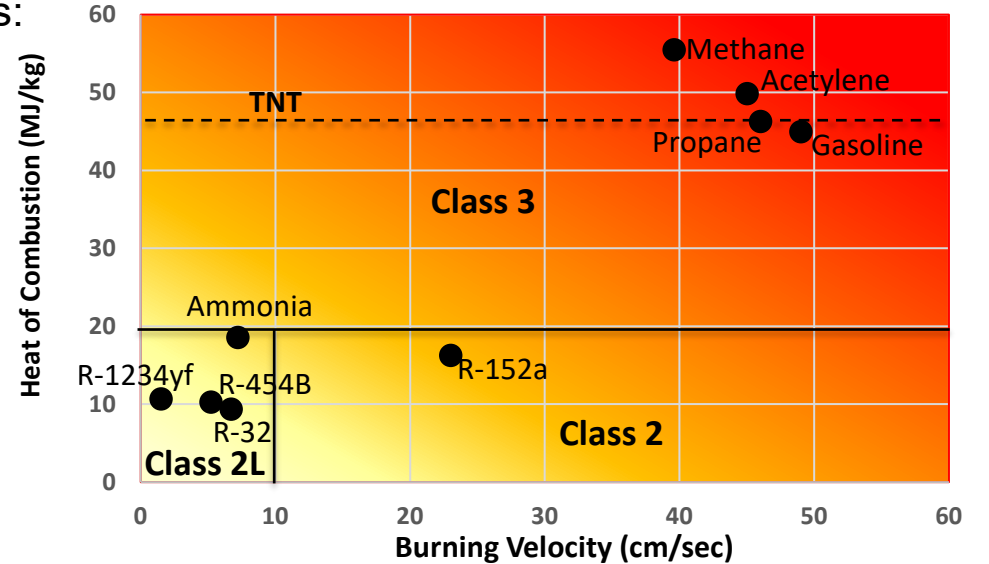
A2L refrigerant is a low risk...it is simply a new issue

A2L Refrigerants are difficult to ignite



A2L Ignition requires:
High ignition energy
High concentration

If ignited, A2L energy release is low



Most Household Objects are NOT A2L ignition sources:

Receptacle & Light Switches



Space Heaters



Kitchen Appliances



Barbecue Igniter



Cigarette



Potential A2L Ignition Sources:

Match or Lighter



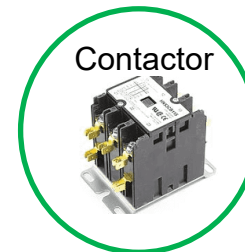
Torch



Candle



Contactor



Addressed by Equipment Safety Standard UL 60335-2-40



UL STANDARD 60335-2-40

Standard for Safety

Household and Similar Electrical Appliances – Safety – Part 2-40: Particular Requirements for Electrical Heat Pumps, Air-Conditioners and Dehumidifiers

Equipment Standard – basis for the design, evaluation, testing, and certification of HVAC equipment

Defines A2L mitigation requirements:

Defines refrigerant leak detection system requirements

Defines refrigerant charge limits based on the minimum occupied volume of the room where the equipment is expected to be used, and a safety factor to ensure any leaked refrigerant is diluted to well below the lower flammability limit (LFL).

As of 1/1/2024 it will replace **UL1995 which will be sunset** except for existing units but any change to an existing unit will require changing to UL60335-2-40

UL60335-2-40 is required for A2L refrigerants and was updated to the **4th edition** which was published in Dec 2022



ASHRAE STANDARD 15

Safety Standard for Refrigeration Systems

Application Standard - Specifies safe design, construction, installation, and operation of refrigeration systems.

Refers to ASHRAE Standard 34 for:

Refrigerant Safety Classification

Refrigerant Concentration Limit

The 2022 version of **ASHRAE 15** has been published

Updated to align with the A2L requirements and mitigation approaches defined in UL60335-2-40 4th edition

Establishes procedures for operating equipment and systems when using those refrigerants.

ASHRAE Standard 15.2 for residential applications was released by not adopted by building codes yet



CODE ACCEPTANCE STATUS

2024 Model Codes ready for full acceptance of A2L refrigerants

States and Local jurisdictions will adopt 2024 Model Codes at their own pace – between 2025 and ~2036

State/Local Codes

45 States + DC and counting have enacted A2L acceptance through code changes and/or legislation

On track for **100% acceptance before 1 Jan 2025** (regulatory deadline)

Research and understand the local and state laws for your area.

Projects must comply with BOTH federal & state regulations.



ICC INTERNATIONAL CODE COUNCIL

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Upcoming Code Changes

The 2024 I-Code changes facilitate compliance with these requirements and support producers and refrigerant appliance manufacturers already transitioning to lower-GWP solutions such as A2Ls. Approved code changes in the 2024 International Building Code (IBC), International Fire Code (IFC) and International Mechanical Code (IMC) allow commercial and residential use of A2L refrigerants to replace high global warming potential (GWP) HFC refrigerants ([Click here to download changes to the 2024 I-Codes](#))

The Code Council, in collaboration with the Air-Conditioning, Heating and Refrigeration Institute (AHRI), are prepared to partner with the construction industry and legislation to help navigate this positive change. Check back here for updates on resources.

A2L Refrigerant Related Code Provisions of the 2024 I-Codes to Consider as Amendments to the 2021 I-Codes

- Required Changes to the 2021 IFC
- Required Changes to the 2021 IBC
- Required Changes for the 2021 IMC



FUTURE ACTIONS?

INTERNATIONAL



Paris Agreement

GHG Emissions

Goal of holding the increase in the global average temperature to well below 2°C above pre-industrial levels.

Countries submit Nationally Determined Contributions (NDC) and action plans. Reporting begins in 2024.

EUROPE



PFAS Restrictions

EU Proposed PFAS Ban

Known as Forever Chemicals Proposal to expand PFAS restrictions to ban production of most PFAS substances, including many HFC and HFO refrigerants in EU. Under review by ECHA with assessment due in 2024.

U.S. FEDERAL



American Innovation and Manufacturing (AIM) Act

HFC Phase Down

Next step change will occur in 2029, moving from 40% to 70% reduction versus baseline

U.S. STATE



U.S. Climate Alliance

25 state governors committed to achieving the goals of the Paris Agreement by advancing state-led, high-impact climate action.



REDUCING EMISSIONS

Total Equivalent Warming Impact (TEWI) = Direct Emissions + Indirect Emissions



DIRECT = Emission x Equivalent CO₂

Direct Emissions:

GWP of the refrigerant

Optimized selection for the refrigerant used

Quantity (lbs.) of the refrigerant charge

Preventative maintenance

Reclaim/recycle the refrigerant at end of life



INDIRECT = Energy Usage x CO₂/kW-hr

Indirect Emissions:

Equipment energy efficiency

Sequence of operation / building automation system

System efficiency using free cooling, economizers, energy recovery & heat recovery

System commissioning for peak building performance

Cleanliness of the local power source

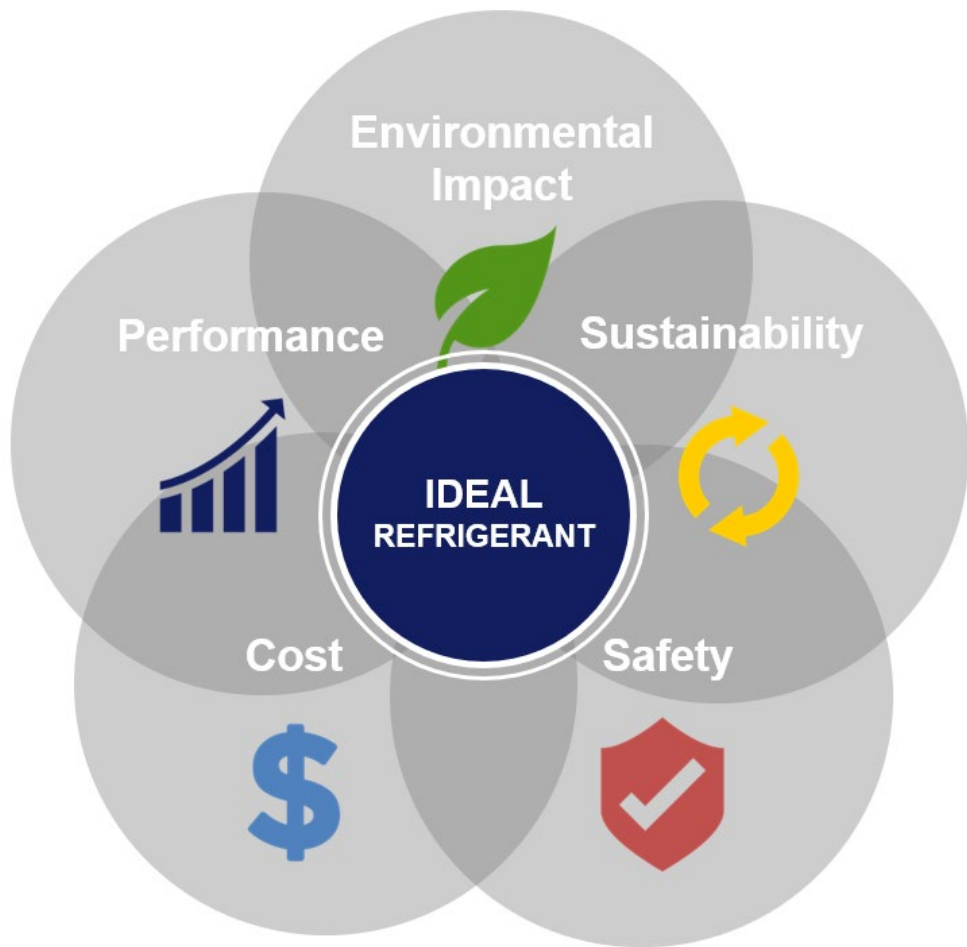
End-of-life disposal plan



Environmental Product Declaration
Life Cycle Environmental Impact



REFRIGERANTS



Refrigerant Considerations are Multifaceted





CEU/PDH CREDITS

- 0.1 CEU/1 PDH credit
- Complete the sign in sheet, providing your email address
- Instructions for accessing the Knowledge Check and obtaining credit will be emailed to you
- Complete the Knowledge Check within 60 days

Carrier

THANK
YOU!



Seminar
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Seminar
SERIES

QUESTIONS