



American Innovation and Manufacturing (AIM) Act Detailed Appliance Management Compliance Checklist

By January 1st, 2026:

Step 1: Inventory your AIM Act-regulated appliances:

- Determine if any of your appliances are impacted by the AIM Act by reading Section 1.4.2 of the [AIM Act Compliance Guide for Small Businesses](#). If you don't have any regulated appliances, this checklist does not apply to you.
- If you have appliances subject to regulations, create an Appliance Inventory by using the [Appliance Inventory Record Template](#).
- ❖ If you require assistance identifying your appliances or creating your Appliance Inventory, email the Clean Air Branch at CAB@doh.hawaii.gov or consult an EPA-certified refrigerant technician (Step 2).

Step 2: Find an EPA-certified refrigerant technician:

- Ensure your refrigerant technician is [EPA 608-certified](#). You may ask to see their certification card, checking that their certification type (I, II, III, or Universal) allows them to work on your specific equipment.

Step 3: Create a Recordkeeping System:

- Read Section 2.1 of the [AIM Act Compliance Guide for Small Businesses](#) to see what records you must keep and keep them in the [Individual Appliance](#)



[Record Template](#), while working with your EPA-certified refrigerant technician. Comprehensive list of records includes:

❖ Records covered in Step 4:

- General service and maintenance
- Leak Inspections
- Verification Tests
- Purged refrigerant exclusions
- Seasonal variance exclusions
- Appliance retrofit plans
- Appliance retirement plans

❖ Additional Records (if applicable) covered in Step 5:

- Automatic Leak Detection System (ALDS) records
- Appliance mothballing
- Change of leak rate calculation method
- Chronically leaking appliance

Step 4: Follow Appliance Management Requirements:

- Read Section 2.2 of the [AIM Act Compliance Guide for Small Businesses](#) to understand appliance management requirements.
- Work with your EPA-certified refrigerant technician to ensure requirements are being met, as outlined below:

❖ Leak Rate Calculations:



- Determine which leak rate calculation method you (or your technician) are using (Annualizing or Rolling Average). In general, once chosen, you may not change methods.
- Each time refrigerant is added to an appliance (unless the addition is made immediately following a retrofit, installation of a new refrigerant-containing appliance, or qualifies as a seasonal variance), record the leak rate in the [Individual Appliance Record](#). You may use the [Leak Rate Calculator](#) tool.
 - If you are excluding 1) purged refrigerants that are destroyed, or 2) added refrigerants due to a seasonal variance, from leak rate calculations, see Step 5 for information.
- Check if each appliance's leak rate is acceptable by referring to Table 2 in Section 2.2.1 of the [AIM Act Compliance Guide for Small Businesses](#). If the leak rate is acceptable, go to Step 5. If the appliance exceeds its acceptable leak rate, you must either 1) perform a leak repair, 2) create a retrofit plan, or 3) create a retirement plan, within 30 days of when the leak rate was calculated (or 120 days for leak repair if an industrial process shutdown is required). See info about these below.

❖ Leak Repairs:

- If performing a leak repair, have your EPA-certified technician first conduct a leak inspection to identify the location of the leak(s). Record the leak inspection in your appliance's [Individual Appliance Record](#).



- After the EPA-certified technician repairs the leak, they must conduct two tests: an Initial Verification Test and a Follow-up Verification Test. Keep records of both tests in your appliance's [Individual Appliance Record](#).
 - Initial Verification Test must be conducted within 30 days (or 120 days if an industrial process shutdown is required) of when the leak rate was calculated.
 - Follow-Up Verification Test must be conducted within 10 days of the successful initial verification test or 10 days of the appliance reaching normal operating characteristics and conditions.

- Determine if your leak repair was successful by conducting post-repair leak inspections. See Section 2.2.2 and Table 3 in Section 2.2.3 of the [AIM Act Compliance Guide for Small Businesses](#) for details.
 - If the leak repair was successful, continue operations as normal.
 - If the leak repair was unsuccessful, you may conduct as many additional repairs and verification tests as needed within the 30-day window (or 120-day window if an industrial process shutdown is required). If the leak is not successfully repaired within this period, the appliance must be retrofitted or retired. See info below.

- Appliance Retrofit Plans:
 - If planning to retrofit your appliance, consult with your EPA-certified technician about options.



- Fill out the Retrofit Plan Template in the [Individual Appliance Record Template](#).
- Execute your plan within one year from when the plan is finalized.
- Appliance Retirement Plans:
 - If planning to retire your appliance, consult with your EPA-certified technician about the process.
 - Fill out the Retirement Plan Template in the [Individual Appliance Record Template](#), have it signed and dated by an authorized company official, and keep it available for EPA inspection upon request.
 - Execute your plan within one year from when the plan is finalized.
- Extension and Relief Requests:
 - If you wish to request an extension to retrofit or retire an appliance, read [40 CFR 84.106\(i\)](#) for requirements, complete the [Retrofit & Retirement Plan Extension Request Form](#), and email it to 608reports@epa.gov. Keep a copy for your records.
 - If you wish to request an extension to complete leak repairs, read [40 CFR 84.106\(f\)](#) for requirements, complete the [Leak Repair Extension Request Form](#), and email it to 608reports@epa.gov. Keep a copy for your records.
 - If you wish to request relief of retrofit or retirement obligations, read [40 CFR 84.106\(h\)\(5\)\(ii\)](#) for requirements, complete the [Request to Cease Retrofit or Retirement Plan Form](#), and email it to 608reports@epa.gov. Keep a copy for your records.



Step 5: Check if any other requirements apply to you (this step includes reporting requirements):

- Do you own an appliance used for industrial process refrigeration or commercial refrigeration with a full charge of 1,500 pounds or more of a regulated refrigerant?
 - You must install and use an automatic leak detection system (ALDS).
Read Section 2.4 of the [AIM Act Guide for Small Businesses](#) for details.
- Do you use an automatic leak detection system (ALDS)?
 - Read Section 2.4 of the [AIM Act Guide for Small Businesses](#) and keep records in the [Automatic Leak Detection System Record Template](#).
- Are you considering suspending a deadline by mothballing an appliance?
 - Read Section 2.5 of the [AIM Act Guide for Small Businesses](#) and keep records in the [Individual Appliance Record](#).
- Are you acquiring a new facility that uses a different leak rate calculation method from your currently owned facilities?
 - Read Section 2.1.3 of the [AIM Act Guide for Small Businesses](#) and keep records in the [Change of Leak Rate Calculation Method Record Template](#).
- Do you have a chronically leaking appliance (leak rate of 125% or more in a calendar year)?



- You must fill out the [Chronically Leaking Appliance Report](#), have it signed and dated by an authorized company official, and email it to 608reports@epa.gov by March 1 of the subsequent year. Keep a copy for your records. Read Section 2.3.1 of the [AIM Act Compliance Guide for Small Businesses](#) for more details.

- Are you excluding purged refrigerants that are destroyed from annual leak rate calculations?
 - Keep a record of this in the [Individual Appliance Record Template](#), have an authorized company official sign and date it, and email it to 608reports@epa.gov within 60 days after the first time the exclusion is used. Keep a copy for your records. See Section 2.3.2 of the [AIM Act Compliance Guide for Small Businesses](#) for more information.

- Are you excluding additions of refrigerant due to seasonal variance from leak rate calculation?
 - Keep a record of this in the [Individual Appliance Record Template](#). See Section 2.7 of the [AIM Act Compliance Guide for Small Businesses](#) for more information.



Reminders

- Submit all reports electronically to the EPA at 608reports@epa.gov.
- You must keep all records and reports for at least 3 years following the date of any activity.
- For free and confidential assistance, contact the Department of Health's (DOH) Clean Air Branch (CAB) by email, at CAB@doh.hawaii.gov, or by phone, at 808-586-4200.

