

# **SECTION 608 REGULATORY CHANGES**



# OVERVIEW: Extends existing regulations for CFCs and HCFCs to HFCs and non-exempt substitutes

TOPIC	Who is Affected	When	Requirement
REFRIGERANT RECLAMATION	*Technicians *Appliance owners/operators	1-1-2017	◆Used HFC, HCFC, and CFC refrigerants must be reclaimed by an EPA certified reclaimer before they can be used in a different owner's system
REFRIGERANT SALES RESTRICTION	*All refrigerant purchasers *All refrigerant sellers	1-1-2018	•Only certified technicians can purchase HFC refrigerants (already required for HCFC and HFC refrigerants); does not apply to EPA exempted substitutes
TECHNICIAN CERTIFICATION	*Persons who service, maintain repair or dispose of appliances (technicians)	1-1-2018	◆Technicians must be certified to open HFC appliances (already applicable to HCFC and CFC appliances); a technician must be certified to perform required leak inspections (a leak inspection is required if the system is known to be leaking above the allowable annual leak rate)
SERVICE PRACTICES	*Technicians *Appliance owners/operators	1-1-2018	◆HFC appliances must be evacuated to same evacuation levels that apply to HCFC and CFC before being opened for servicing
		1-1-2019	<ul> <li>◆Lower allowable leak rates apply to all refrigerant appliances containing 50 or more lbs.</li> <li>◆Leak inspection required for all refrigerant application that exceed the allowable leak rate (it is up to the technician to determine the appropriate method to detect leaks)</li> <li>◆Leak repair verification test required for all refrigerant appliances that exceed the allowable leak rate</li> <li>◆Must provide equipment owners with invoices that include the amount of refrigerant added</li> <li>◆Must provide equipment owners with the results of leak inspection and verification tests</li> </ul>
	*Appliance owners/operators	1-1-2019	<ul> <li>Must calculate leak rate each time refrigerant is added to an appliance containing 50 lbs. or more of refrigerant</li> <li>Must comply with lower allowable leak rates</li> <li>Must repair leaks in an affected appliance until the appliance is below the allowable leak rate</li> <li>Must have the leak(s) repaired within 30 days of determining that the leak rate exceeds the allowable rate</li> <li>Must notify EPA if more than 30 days are needed to complete a repair (e.g. replacement component will not be available within 30 days)</li> <li>Must develop a retrofit or replacement plan if allowable leak rate cannot be achieved within allotted time</li> <li>Must perform initial and follow up verification after a leak(s) has been repaired to confirm the repair(s) worked</li> <li>Must retain records on amount of refrigerant added to an appliance</li> <li>Must retain records of results of leak inspection and verification tests</li> <li>Must submit report to EPA no later than March 1 if an appliance leaks 125% or more of its full charge in one calendar year (chronically leaking appliance)</li> <li>Must include in report to EPA efforts to identify and repair chronically leaking appliance</li> </ul>
APPLIANCE DISPOSAL	*Technicians	1-1-2018	<ul> <li>HFC appliances destined for disposal must be properly evacuated prior to disposal</li> <li>Records must be maintained for disposed appliances that contained between 5 and 50 lbs. of refrigerant (this already applies to appliances that contained 50 lbs. or more)</li> </ul>



# Aireco

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## RECORDKEEPING---All records must be maintained for 3 years

Record Type	What Must be Included	Who Must Retain the Records	Record Source
APPLIANCE INFORMATION	◆Documentation of each appliance's full charge  ◆Amount of refrigerant added to or removed from an appliance each time  ◆Calculation of leak rate  ◆When a leak inspection is performed  ◆When verification is conducted  ◆When service or maintenance is performed  ◆Automatic leak detection system information if applicable	Owner/Operator Owner/Operator Owner/Operator Owner/Operator Owner/Operator Owner/Operator Owner/Operator	Owner/Operator Technician Owner/Operator Technician Technician Technician Technician
APPLIANCE DISPOSAL	<ul> <li>◆Name of company disposing of appliance</li> <li>◆Location of appliance</li> <li>◆Date of recovery and type of refrigerant recovered from appliance</li> <li>◆Total quantity of refrigerant by type recovered from all disposed appliances/month</li> <li>◆Quantity and type of recovered refrigerant sent for reclamation or destruction</li> <li>◆Name of company recovered refrigerant was transferred to and date of transfer</li> </ul>	Technician Technician Technician Technician Technician Technician	Technician Technician Technician Technician Technician Technician
LEAK INSPECTION (if applicable)	<ul> <li>◆Date of leak inspection</li> <li>◆Method(s) used to detect leaks</li> <li>◆Calculation of leak rate</li> <li>◆Location of each leak identified during inspection</li> <li>◆Certification statement indicating that all visible and accessible parts were inspected</li> </ul>	Owner/Operator Owner/Operator Owner/Operator Owner/Operator Owner/Operator	Technician Technician Owner/Operator Technician Technician
VERIFICATION TEST (if applicable)	◆Location of appliance  ◆Date of verification test  ◆Location of each repaired leak that was tested  ◆Type of verification test used  ◆Result of each verification test	Owner/Operator Owner/Operator Owner/Operator Owner/Operator Owner/Operator	Technician Technician Technician Technician Technician

### TECHNICANS ARE REQUIRED TO PROVIDE THE FOLLOWING INFORMATION TO APPLIANCE OWNERS/OPERATORS:

### For any Maintenance, Service Repair, or Disposal of an Appliance:

- ◆Identity and location of appliance
- ◆Date and type of maintenance, etc., performed including: location of repair, leak inspections or verification tests, if applicable
- ◆Name and contact information of person performing maintenance, etc.
- \*Amount of refrigerant added to or removed from an appliance



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ALLOWABLE LEAK RATES - Only applies to appliances containing 50 lbs. or more of a refrigerant

Appliance Type	Current Leak Rate	New Leak Rate Effective 1/1/2019
Industrial Process Refrigeration	35%	30%
Commercial Refrigeration	35%	20%
Comfort Cooling	15%	10%

#### **LEAK DETECTION** ◆EPA does not require a specific method for detecting leaks

- ◆Leak inspection must be conducted on all visible and accessible components of an appliance
- \*What is not considered visible or accessible:
  - Insulated components
  - Components iced over
  - Components that are underground, behind walls or otherwise inaccessible
  - Components that are located in a position that requires the technician to be elevated more than 6.5 feet
  - Components that are located on the equipment where it would be unsafe for the technician to inspect

**EXCEPTION** •An equipment owner can choose to install an Automatic Leak Detection system that continuously monitors a whole appliance or portions of the appliance in lieu of performing required periodic inspections

- **LEAK REPAIR** ◆Required to repair leak(s) when allowable leak rate is exceeded
  - ◆Must demonstrate that the repair resulted in the appliance no longer exceeding the allowable leak rate
  - ◆Must perform initial verification test that leak is repaired before adding refrigerant back into the repaired appliance
  - ◆Must conduct follow-up verification test after the repaired appliance returns to normal operating performance and condition
  - ◆Must perform periodic leak inspections of visible and accessible components and parts:

Appliance	Full Charge Size	Frequency of Leak Inspections	
Commercial Refrigeration & Industrial Process Refrigeration	<u>&gt;</u> 500 lbs.	1x/3mos. until leak rate has not exceeded threshold for four consecutive quarters	
	50 to <500 lbs.	1x/calendar year until leak rate has not exceeded threshold for one year	
Comfort Cooling	≥ 50 lbs.	1x/calendar year until leak rate has not exceeded threshold for one year	

- ◆Leak Repairs and inspections must be documented with the following information:
- date of leak inspection
- method(s) used to detect leaks
- location of each leak identified during inspection
- certification statement indicating that all visible and accessible parts were inspected