



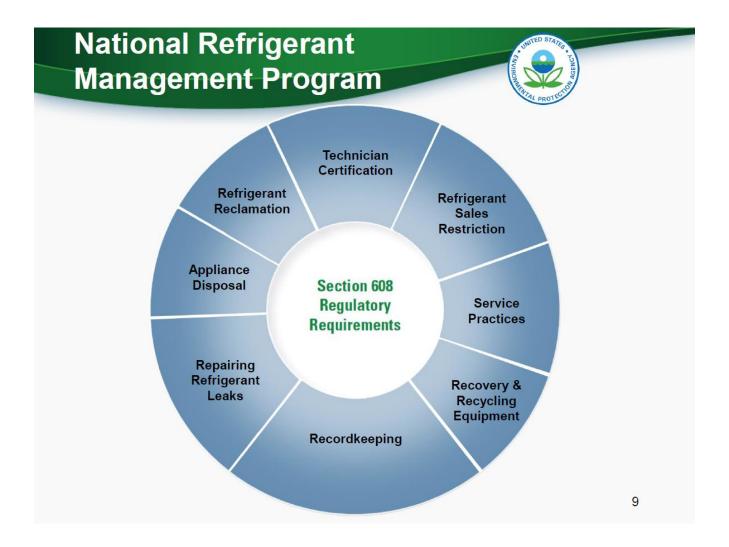
## Updates to Section 608 ODS Management Program

Midwest Environmental Compliance Conference (MECC) May 17-18, 2017





## **Overview – Section 608 Refrigerant** Management Program





## Overview – Revised Section 608 Refrigerant Management Program

- Affected Refrigerants
  - Ozone Depleting (i.e. CFCs and HCFCs)
  - Substitutes (e.g. HFCs, HFOs, PFCs and their blends)
  - Exempt Substitute (e.g ammonia, CO<sub>2</sub>)
- Maintains "venting prohibition" (e.g. venting, release, disposal)
- Rule changes allow
  - Consistent treatment of commonly used refrigerants
  - BMPs to reduce leaks from large appliances
  - Focus on assuring effective repairs
  - GHG emission reduction benefits
  - Enhancing rule clarify for compliance
  - Removed obsolete requirements



#### **Ozone Depleting (Currently Covered by Section 608)**

- Class I (CFCs): Methyl chloroform, carbon tetrachloride, halons, etc. (banned)
- Class II (HCFCs): R-141b, R-142b, R-22, to be phased out by 2020 (99.5%)

#### Non-Exempt Substitutes (Covered by New Section 608 Requirements)

- HFCs: R-404A, R-134a, R-410A, R-407A, R-507A (Potent GHG!)
- Hydrofluoroolefins (HFOs) and their blends
- Perfluorocarbons (PFCs) and their blends

#### **Exempt Substitutes (Not covered by Section 608 – current or new)**

- Ammonia, chlorine, water, R-441A
- Nitrogen, hydrocarbons, CO<sub>2</sub>



#### *Starting* 01.01.17:

 EPA removing requirement that techs certify they own certified refrigerant-recovery equipment

*Starting 01.01.18:* 

- Only a Section 608 certified technician can handle and open HFC & non-exempt substitutes in appliances
- Certifying organizations must post list of new techs certified after 01.01.17



#### *Effective 01/01/17 – For recovery/recycling equipment*

- Newly mfr'd or imported models must be certified for use with HFCs
- As part of certification, EPA adopting UL flammability standard to assure safe use of equipment designed for flammable refrigerants

#### *Effective 01/01/18 Technicians must:*

- use certified recovery/recycling equipment when opening HFC appliances
- evacuate to specified levels of vacuum when opening HFC appliances

## **Key ODS Rule Changes – LEAK RATE**



*Effective 01.01.19*: Modified leak repair requirements apply to all refrigerants (excluding exempt refrigerants cited earlier)

- Leak rate MUST be calculated <u>every</u> time refrigerant is added to an appliance containing ≥50 lbs. refrigerant
- Revised leak rate thresholds:
  - 30% for Industrial Process Refrigeration (IPR) decreased from 35%
  - 20% for Commercial Refrigeration decreased from 35%
  - 10% for comfort cooling decreased from 15%
- Certified tech must perform a leak inspection to identify necessary repairs
- Repair must bring appliance leak rate below the threshold (demonstrated when calculating leak rate upon next refrigerant addition)

## **Key ODS Rule Changes – LEAK REPAIR**



<u>Verification Tests</u> - Used to demonstrate leaks were successfully repaired

- Initial Verification Test done before refrigerant is added to repaired unit
- Follow-up Verification Test done after repaired unit returns to normal operation conditions
- Requirements now apply to ALL refrigeration (IPR, Commercial, Comfort)
- If either initial or follow-up verification test indicates repairs were NOT successful – you many conduct as many additional repairs and subsequent verification tests as needed within the 30-day repair period
- Extensions to 30-Day Repair Schedule:
  - Now extended to commercial and comfort cooling appliances
  - Allowed for repl. component parts not available within 30 days, but all other repairs must be completed, verified, documented w/in 30 days

## Key ODS Rule Changes – PERIODIC LEAK INSPECTIONS



- Required for appliances which exceed the threshold leak rate
- Must be conducted by certified technician (ODS & Substitutes)
- All visible and accessible components must be inspected
- Frequency of Periodic Leak Inspections:

Equipment	Full Charge	Frequency
Commercial Refrigeration & IPR	≥ 500 lbs. 50 to 500 lbs	<ul> <li>Once/3 mths until no exceedance of leak rate threshold for 4 qtrs in a row</li> <li>1X/ calendar yr until no exceedance of leak rate threshold for 1 yr</li> </ul>
Comfort Cooling	≥ 50 lbs.	<ul> <li>1X/ calendar yr until leak rate not exceeded 10% for 1 yr</li> </ul>



# Thank you

## Questions?

Melissa Hart – Sr. Client Services Manager & Industrial Market Director P: 314.250.6687 | E: <u>mhart@trcsolutions.com</u> www.trcsolutions.com