

The EPA's Updated Refrigerant Management Requirements

What Reclaimers Need to Know



What are the Section 608 regulations?

Section 608 of the Clean Air Act prohibits the knowing release of refrigerant during the maintenance, service, repair, or disposal of air-conditioning and refrigeration equipment. The EPA requires proper refrigerant management practices by reclaimers, owners and operators of refrigeration and air-conditioning systems, technicians, and others.

What's changing in these regulations?

In the fall of 2016, the EPA updated the existing requirements related to ozone-depleting substances (ODS), such as CFCs and HCFCs, and extended them to substitutes such as HFCs.¹ The updates include:

- More stringent requirements for repairing leaks in larger appliances;
- New recordkeeping for the disposal of appliances containing five to 50 pounds of refrigerant;
- New reporting requirement that kicks in when larger appliances leak 125% or more of their charge in a calendar year;
- Restricting the sale of HFC refrigerant to technicians certified under Sections 608 or 609 of the Clean Air Act; and
- Changes to improve readability and simplify compliance.

In addition to protecting the ozone layer, the EPA estimates that the updated requirements will decrease annual greenhouse gas emissions by **7.3 million MTCO₂e**—that's equivalent to taking 1.5 million cars off the road per year.

How will the new requirements affect reclaimers?

Starting **January 1, 2017**, reclaimers will need to comply with the revised provisions.² Changes to the existing regulations are underlined.

- The EPA is establishing reclamation standards for HFCs, PFCs, and HFOs based on AHRI Standard 700-2016, Specifications for Refrigerants. Reclaimers must:
 - Analyze each batch of ODS and non-ODS refrigerant being reclaimed;
 - Verify that each batch of reclaimed refrigerant meets the AHRI 700-2016 standard;
 - Release no more than 1.5 percent of the refrigerant during the reclamation process; and
 - Dispose of wastes from the reclamation process (e.g., oils) in compliance with all applicable laws and regulations (e.g., Resource Conservation and Recovery Act).
- Reclaimers must maintain records of the quantity of each refrigerant sent for reclamation; the mass of each CFC, HCFC, and substitute refrigerant (e.g., HFCs) reclaimed; the mass of waste products from the reclamation process; and customer and sales records.

¹ These regulations do not extend to substitutes that have been exempted from the venting prohibition, such as ammonia.

² This fact sheet highlights select changes that may be of most interest to this community. Please see the regulations for the full changes/requirements.

- Reclaimers must submit annual reports to the EPA noting the mass of ODS and substitute refrigerant received for reclamation by refrigerant type, the mass of refrigerant reclaimed by refrigerant type, and the mass of waste products from the reclamation process.
 - The EPA is now providing an electronic form for this report and encourages reclaimers to send them to 608reports@epa.gov.

Additional Resources

Update to the Refrigerant Management Requirements Final Rule:

www.epa.gov/section608/revised-section-608-refrigerant-management-regulations

The EPA's Section 608 Webpage: www.epa.gov/section608

AHRI 700-2016 Standard, Specifications for Refrigerants:

http://www.ahrinet.org/App_Content/ahri/files/STANDARDS/AHRI/AHRI_Standard_700-2016.pdf

The EPA Stratospheric Ozone Contact: spdcomment@epa.gov



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Office of Air and Radiation (6205T)
EPA-430-F-16-069
September 2016