

SAMPLE POLICY: COMPANY NAME

Date:

Mission:

[COMPANY NAME] is setting a policy in writing to comply with the U.S. Environmental Protection Agency's "No Vent Law", which prohibits venting of refrigerants into the atmosphere for any reason. Our mission is to reduce refrigerant emissions into the atmosphere to the lowest achievable and practical levels. We also intend to reuse recovered, recycled and reclaimed refrigerant to its maximum potential. It is our intention in good faith to develop maintenance and operational service practices that prevent refrigerant releases, and to recover or safely dispose of any substance using proper refrigeration technology.

Responsibilities of [Facility Services] for [COMPANY NAME]

- Must comply with EPA Section 608 National Recycling and Emission Reduction Program regulations.
 - Reference the following EPA web pages:
 - http://epa.gov/ozone/title6/downloads/Section_608_FactSheet2010.pdf
 - <http://www.epa.gov/Ozone/title6/608/608fact.html>
- Leak repair and service provisions apply to connected-refrigerant-circuit with a circuit capacity of 50 pounds or more refrigerant (example included in appendix).
- Service technicians are responsible to maintain their EPA Approved Testing Certification.
- Service technicians must perform refrigerant service only on appliances with refrigerants, recovery equipment, recycling equipment, and refrigerant cylinders for which they are certified.
- When handling appliances with refrigerants, recovery equipment, recycling equipment, and refrigerant cylinders, service technicians must have their "certification cards" at all times.
- **[Facility Services]** must provide its technicians with good working recovery and recycling equipment as a tool for recovering or recycling refrigerants.
- When opening, servicing, repairing, and disposing of appliances with refrigerants, service technicians must have at least one self-contained recovery equipment or recycling equipment at all times.
- All appliances with refrigerants, recovery equipment, recycling equipment, and refrigerant cylinders shall be clean and leak free.
- The service technician is responsible to maintain all appliances with refrigerants, recovery equipment, recycling equipment, and refrigerant cylinders in good working condition.
- If appliances with refrigerants, recovery equipment, recycling equipment, and refrigerant cylinders are not functioning or are not in good working condition or need to be repaired, it is the responsibility of the service technician to report it on an **[FORM NAME]** to the **[Facility Services Supervisor]**, and it is the sole responsibility of the service technician to repair the appliances with refrigerants, recovery equipment, recycling equipment, and refrigerant cylinders before performing any service on the same.
- Preventive maintenance shall be performed on the appliances with refrigerants, recovery equipment, recycling equipment, and refrigerant cylinders as required.

- Appliances with refrigerants, recovery equipment, recycling equipment, and refrigerant cylinders that fail due to lack of maintenance will be the responsibility of the service technician.
- Oils extracted during service should be kept, marked and disposed of separate from other oils.
- Each refrigerant cylinder shall be marked for identification purposes (refer to subsection on labeling requirements).
- Refrigerants of different types shall not be mixed with one another.
- For disposal of appliances (even if the disposal is performed by non-[COMPANY NAME] entity or person), it is the responsibility of [COMPANY NAME]'s [maintenance and operations service technician] to maintain a copy documenting disposal details on an [FORM NAME]; and, if refrigerant is recovered before final disposal of the appliance, such details must be documented on a [FORM NAME].
- The [Facility Services Supervisor] will make an effort in good faith to provide an in-house training session to all new employees of [FACILITY SERVICES] who will perform refrigerant services.
- The [Facility Services Supervisor] will provide a copy of this policy to all technicians who will perform refrigerant services.

EPA Technician Certification:

As per the Clean Air Act Amendments Section 608, the four types of certifications for stationary equipment are as follows:

Type of equipment serviced	Level of required certification
Small equipment (<5lbs)	Type I
High and very-high pressure equipment	Type II
Low pressure equipment	Type III
All types	Type IV Universal*

* Type IV Universal does not include automobile air conditioning systems.

For more details on technician certification refer to the following EPA web pages:

- <http://www.epa.gov/ozone/title6/608/608fact.html#techcert>
- <http://www.epa.gov/ozone/title6/608/technicians/index.html>

Evacuation Requirements:

Service technicians must evacuate air conditioning and refrigeration appliances as per EPA Section 608 Refrigerant Recycling Rule.

Required Levels of Evacuation for Appliances (Except for Small Appliances, MVACs, and MVAC-like Appliances)**

System Type	System Size	Required Vacuum*
Low pressure (containing e.g. R-11 & R-123)	All sizes	25 mm absolute pressure
Medium pressure (containing e.g. R-12):	< 200 lb charge	10 inches Hg vacuum
Medium pressure	≥ 200 lb charge	15 inches Hg vacuum
High Pressure (containing e.g. R-22)	< 200 lb charge	0 inches Hg vacuum
High Pressure	≥ 200 lb charge	10 inches Hg vacuum
Very high pressure: (e.g. R13, 503)	All sizes	0 inches Hg vacuum

* Relative to standard atmospheric pressure of 29.9 inches of Hg.

**Reference: <http://www.epa.gov/ozone/title6/608/608fact.html#evac>

For more details on evacuation requirements refer to the following EPA web pages:
<http://www.epa.gov/ozone/title6/608/608fact.html#servreqs>

Refrigerant Leaks:

Pursuant to EPA Section 608, appliances with refrigerant charges of greater than 50 pounds are required to repair leaks in the equipment when those leaks together would result in the loss of more than a certain percentage of the appliance's charge over a year. For the commercial and industrial process refrigeration sectors, leaks must be repaired when the appliance leaks at a rate that would release 35 percent or more of the charge over a year. For all other sectors, including comfort cooling, leaks must be repaired when the appliance leaks at a rate that would release 15 percent or more of the charge over a year. Preventive maintenance shall be performed to test for leak integrity.

Leaks must be repaired within 30 days of discovery. If [Facility Services] develops a one-year retrofit or retirement plan for the leaking unit, then the 30 days repair requirement is waived. Industrial process refrigeration appliances requiring an industrial process shutdown qualify for 120 days to repair a leak.

For more details on refrigerant leaks refer to the following EPA web pages:

- <http://www.epa.gov/ozone/title6/608/608fact.html#leaks>
- <http://www.epa.gov/ozone/title6/608/leak.html>

Safe Disposal:

All appliances with refrigerants, recovery equipment, recycling equipment, and refrigerant cylinders must be disposed of as per the "Safe Disposal Requirements of EPA Section 608" (copy attached).

For more details on safe disposal refer to the following EPA web page:

- <http://www.epa.gov/ozone/title6/608/608fact.html#disposal>

Labeling:

As per Air Conditioning, Heating and Refrigeration Institute Guidelines, all refrigerant containers of class I or class II substances must be labeled:

"WARNING: Contains CFC/HCFC, a substance which harms public health and environment by destroying ozone in the upper atmosphere."

Record keeping:

- **Facility Services:**
 - Must comply with EPA Section 608 National Recycling and Emission Reduction Program regulations.
 - Must keep detailed technical information on every appliance which contains 50 or more pounds of refrigerants that is maintained and serviced by the **Facility Services**.
 - Must keep servicing records documenting the type of service, the date of service, and the quantity of refrigerant added. Every service performed must be accompanied by a **[FORM NAME]**, which is completed, signed and dated by the technician. Such documents must be maintained for a minimum of three years from the date of service performed.
 - A Recycling Report must be filled out every time the recovery equipment or recycling equipment is used.
 - Must keep records of refrigerant purchased documenting the name of the seller, date of purchase, and the type and quantity of refrigerant purchased.
 - Must keep records of all materials sent for reclamation documenting the names and addresses of the reclaimer, and the quantity of material sent to them for reclamation. Such information must be documented on an **[FORM NAME]**.
 - Must maintain documentation on leak repair and leak rate calculations. Leak repairs must be documented on **[FORM NAME]**.
 - Must keep records of any initial or follow-up leak tests. Leak tests must be documented on the **[FORM NAME]**.
 - If an appliance is scheduled for retirement or replacement, such plans must indicate a reasonable source of funding for retirement or replacement.
 - Must certify to the local EPA Regional Office that the Facility Services has acquired (built, bought, or leased) recovery or recycling equipment and that the

Facility Services is complying with the applicable EPA requirements. This certification should be sent on a completed, signed and dated EPA form "Refrigerant Recovery or Recycling Device Acquisition Certification Form"; a copy of this form should be maintained in the Facility Services records. Facility Services does not have to send in a new form each time they add recycling or recovery equipment to the inventory.

- Must keep a copy of each technician's proof of EPA certification.
- Attached forms must be used for record keeping purposes. All such forms, signed in original, must be submitted by [Facility Services] to [APPROPRIATE DEPARTMENT]
- Records must be maintained for three years.
- **Technicians:**
 - Must comply with EPA Section 608 National Recycling and Emission Reduction Program regulations.
 - Must keep a copy of their proof of certification at the Facility Services.
 - When servicing appliances that contain 50 or more pounds of refrigerant, technicians must provide the [Facility Services Supervisor] with a [FORM NAME] which is completed, signed and dated by the technician.
 - All information on the [FORM NAME] must be filled completely.
- **Service Contractors:**
 - Must comply with EPA Section 608 National Recycling and Emission Reduction Program regulations.
 - Must keep servicing records documenting the type of service, the date of service, and the quantity of refrigerant added or removed on every appliance that is maintained and serviced by the service contractor for [COMPANY NAME] at its facility. Such documents must be maintained for a minimum of three years from the date of service performed.
 - Must submit to the [Facility Services Supervisor] an original [FORM NAME] completed, signed and dated by the technician performing the task for every service performed. Failure to submit this form will delay project completion and will delay project payment.
 - All information on the [FORM NAME] must be filled completely.
 - A Recycling Report must be filled out every time the recovery equipment or recycling equipment is used and must submit a copy to the Facility Services.
 - Must certify to the local EPA Regional Office that the service contractor has acquired (built, bought, or leased) recovery or recycling equipment and that the service contractor is complying with the applicable EPA requirements. This certification should be sent on a completed, signed and dated EPA form "Refrigerant Recovery or Recycling Device Acquisition Certification Form." If recovery or recycling equipment will be used to perform service contract work on [COMPANY NAME] equipment, a copy of this form should be submitted to the Facility Services records.
 - Service contractor technicians must submit a copy of their proof of certification to the Facility Services.
 - All documents (except the [FORM NAME]) submitted by the service contractor must be dated and signed by a responsible officer and will be responsible and liable for the information provided.
 - When performing service on an [COMPANY NAME] contract, service contractor technicians must have their "certification cards" at all times.

- o When any service contractor technician arrives at [COMPANY NAME] facility to perform any type of service order work, they must sign in at the Facility Services front desk.
- o [FORM NAME] must be submitted within two working days of final completion. This pertains to all refrigerant projects on facility grounds. We require that both under 50 lbs., and over 50 lbs., must be documented.
- o Upon completion of any refrigerant service order work, the technician must give all completed documents to the [Facility Services Office] in person.
- o Payments on invoices received will be authorized by [Facility Services Supervisor] only after the above documentation and the project has been completed and approved to his satisfaction.
- **[COMPANY NAME, DEPARTMENT]:**
 - o Responsible for all refrigerant purchases.
 - o Responsible for all refrigerant dispensing.

For more information, visit
PhaseOutFacts.org

