EPA's Refrigerant Management Requirements

What Reclaimers Need to Know



What is Section 608?

Section 608 of the Clean Air Act prohibits the knowing release of refrigerant during the maintenance, service, repair, or disposal of air-conditioning (AC) and refrigeration equipment. EPA requires proper refrigerant management practices by reclaimers, those who buy or sell refrigerant, technicians, owners and operators of AC and refrigeration systems, and others. These requirements apply for all refrigerants that contain ozone-depleting substances, e.g., hydrochlorofluorocarbons (HCFCs), and non-exempt substitute refrigerants, e.g., hydrofluorocarbons (HFCs), hydrofluoroolefins (HFOs) and blends thereof.

Some refrigerants are exempt from the refrigerant management requirements. Examples include carbon dioxide, nitrogen, and water. For a full list of exempt refrigerants, see 40 CFR § 82.154(a).

What are the Section 608 refrigerant management requirements for reclaimers?¹

Reclaimers must comply with the following provisions for ozone-depleting and non-exempt substitute refrigerants. These provisions did not change as a result of EPA's 2020 update.

- EPA established reclamation standards for all non-exempt refrigerants based on AHRI Standard 700-2016, *Specifications for Refrigerants*. Reclaimers must:
 - Analyze each batch of refrigerant being reclaimed;
 - Verify that each batch of reclaimed refrigerant meets the EPA reclamation standard;
 - o Release no more than 1.5 percent of the refrigerant during the reclamation process; and
 - o 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 refrigerant reclaimed; the mass of waste products from the reclamation process; and customer and sales records.
- Reclaimers must submit annual reports to EPA noting the mass of 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.
 - o EPA provides an electronic form for this report and encourages reclaimers to submit electronically to 608reports@epa.gov.

¹ This fact sheet highlights select provisions that may be of most interest to this community. Please see the regulations at https://go.usa.gov/xpKhq for the full requirements.

o If the submission contains confidential business information, the information should be submitted in hard copy via U.S. Postal Service to:

Section 608 Program Manager Stratospheric Protection Division Mail Code 6205T U.S. Environmental Protection Agency 1200 Pennsylvania Avenue NW. Washington, DC 20460

o Via courier: Please contact EPA at <u>608reports@epa.gov</u> to arrange for receipt.

Additional Resources

Update to the Refrigerant Management Requirements Final Rule:

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

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

EPA's Section 608 Reclamation Webpage:

www.epa.gov/section608/stationary-refrigeration-refrigerant-reclamation-requirements

Contact EPA: www.epa.gov/section608/forms/contact-us-about-stationary-refrigeration-and-air-conditioning