

REGULATORY ASSISTANCE

Refrigerant Management Services



Founded in 1974, Trinity Consultants helps organizations overcome complex, mission-critical challenges in EHS, engineering, and science through expertise in consulting, technology, training, and staffing. We support clients in geographies worldwide and across a broad range of sectors including industrial, energy, manufacturing, mining, life sciences, and commercial/institutional.

Refrigerant Management Expertise

Trinity has been following U.S. EPA (EPA) and local agency activities associated with refrigerant compliance since promulgation of 40 CFR 82, Subpart F (Subpart F) in the 1990s. Due to the common use of refrigerant containing equipment (e.g., air conditioning units, industrial refrigeration equipment, chillers, etc.), these regulations are far-reaching, and the compliance obligations are commonly misunderstood.

The regulations outlined in Subpart F promote the recovery, recycling, and reclamation of refrigerants used in stationary appliances through a prohibition on intentional venting, sales restrictions, technician certification requirements, disposal requirements, and leak repair provisions for *large appliances* (i.e., those appliances with at least 50 pounds of regulated refrigerant in a single circuit).

In late 2016, EPA significantly revised Subpart F, including extending the requirements to cover non-exempt substitute refrigerants that do not

contain ozone-depleting substances (ODS), overhauling the leak repair provisions for large appliances, and requiring more stringent recordkeeping for appliance disposal. However, in March 2020, EPA rescinded the extended leak repair provisions to appliances using non-exempt substitute refrigerants. All other portions of the 2016 revised rule remain in place, including Chronic Leaker Reporting and leak inspections, if triggered.

To add even more complexity, some state agencies have developed their own refrigerant management rules. These states and others have joined the U.S. Climate Alliance, which is a bipartisan coalition of governors focused on reducing greenhouse gas emissions.

As a result, Trinity has identified that the compliance burden surrounding refrigerant management has significantly increased in the last three decades. Thereby, we have established a team of consultants focused on helping our clients develop compliance programs to meet these regulations.

Trinity provides support and guidance for clients helping them achieve compliance with these regulations. The following sections explain some of our services related to refrigerant management compliance.

Refrigerant Management Services

Refrigerant Compliance Program and Operating Procedures

Trinity works with clients to develop an inventory of refrigerant containing equipment. Trinity uses this inventory to develop a site-specific compliance program outlining applicable monitoring, inspection, disposal, recordkeeping, and reporting requirements.

Compliance Audits and Gap Assessments

Trinity assists clients in determining their compliance status with respect to the refrigerant rules. Trinity performs both comprehensive audits of refrigerant management programs as well as high level gap assessments to determine potential compliance issues. These audits and gap assessments typically include in-person site visits to identify applicable units to review compliance documentation, and to evaluate current compliance practices and site-specific procedures. Both assessments help companies gain an understanding of the necessary steps to come into compliance with 40 CFR 82 specifically tailored to their site. Trinity also assists facilities to resolve compliance gaps found with respect to any other sections of the rule (MVAC, labeling, halons, etc.) during assessments/audits.



Example metrics used in the evaluation include:

- ▶ refrigerant-containing appliance specifications (e.g., age, refrigerant type/charge)
- ▶ availability of next generation/alternative refrigerants [e.g., hydrocarbons and hydrofluoroolefins (HFOs)]
- ▶ retrofit options from appliance manufacturers and refrigerant contractors

Trinity can also incorporate sustainability metrics into the evaluation, including refrigerant global warming potential (GWP), “stored” carbon dioxide equivalent (CO₂e), and actual leaked CO₂e. A thorough evaluation provides clients with an understanding of the potential impact of the phasedowns and suggested actions to prepare.

CoolTracker 365™ Implementation

Trinity's CoolTracker 365™ is a Microsoft Excel®-based tool designed to track compliance with Subpart F for stationary refrigeration appliances. This tool helps facilities manage compliance with the leak repair requirements of 40 CFR 82.157, as well as documenting appliance disposal and off-site refrigerant transfer. Trinity has implemented this tool for numerous clients to help them manage their programs and facilitate compliance. For more information on this tool, please view our website and our CoolTracker 365 service sheet.

Refrigerant Reporting Support

The revised regulations in Subpart F require reporting when large appliances containing Class I or Class II ODS leak $\geq 125\%$ of their full refrigerant charge during the calendar year. The “Chronic Leaker Report” must be submitted by March 1 of the following year. Trinity supports clients with developing Chronic Leaker Reports, including determining whether reporting is triggered, gathering the necessary data, and preparing the report.

Refrigerant Management Training

Trinity provides refrigerant management training to environmental professionals, maintenance staff, and refrigerant technicians (including contractors). This training outlines what the rule requires regarding compliance, such as leak repair, recordkeeping, and reporting requirements, as well as best practices for program management and common pitfalls. Trinity presents a formal in-person and webinar-based course called **“Compliance Workshop for Refrigerants & Ozone Depleting Substances”** several times a year. Additionally, Trinity has developed custom training courses for companies based on their specific operations.

Evaluating Refrigerant Phasedown Exposure

As of January 1, 2020, the production and import of R-22 (the most commonly used refrigerant in stationary appliances) and R-142b ceased. A 99.5% percent reduction from baseline for all other Class II ODS, or hydrochlorofluorocarbons (HCFCs) was also implemented.

EPA's new focus is on the phasedown of Greenhouse Gas (GHG) refrigerants, including hydrofluorocarbons (HFCs). Due to the reduced supply and increased cost of all refrigerants, Trinity is assisting clients with evaluating their exposure to minimize risk and to maximize cost savings through development of an appliance scorecard and refrigerant reduction strategy evaluation.

Why Choose Trinity

In short, there is no better choice for your EHS needs. Our experience is multi-faceted and extensive. Our strategies are innovative, time saving, and cost-effective. Our staff and tools are the best in the business.

For more information about how we can help your organization, please contact Trinity Consultants by calling 800.229.6655.

ISO 9001:2015 certified at our corporate office in Dallas, Texas

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