
Recordkeeping and Reporting for the 608 Refrigerant Management Program

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U.S. Environmental Protection Agency
Stratospheric Protection Division
Office of Atmospheric Programs
1200 Pennsylvania Avenue, NW
Washington, DC 20460

I. Introduction

The following guide describes the recordkeeping and reporting requirements of the Section 608 Refrigerant Management Program. These requirements are applicable to refrigerant reclaimers, refrigerant wholesalers, technician certification programs, small appliance disposal facilities, technicians, owners/operators of appliances with charge sizes of more than 50 pounds, manufacturers of small cans of MVAC refrigerant, and refrigerant recovery/recycling equipment testing organizations.

This document is intended to assist entities with their recordkeeping and reporting obligations. This guidance does not supersede the Code of Federal Regulations (CFR). Please consult the CFR for the complete list of requirements.

This guidance and the requirements in 40 CFR part 82, subpart F do not apply to certain refrigerants. As of March 2017, the list of exempt substitute refrigerants includes:

- Carbon dioxide in any application;
- Nitrogen in any application;
- Water in any application;
- Ammonia in commercial or industrial process refrigeration or in absorption units;
- Chlorine in industrial process refrigeration (processing of chlorine and chlorine compounds);
- Hydrocarbons in industrial process refrigeration (processing of hydrocarbons);
- Ethane (R-170) in very low temperature refrigeration equipment and equipment for non-mechanical heat transfer;
- Propane (R-290) in retail food refrigerators and freezers (stand-alone units only); household refrigerators, freezers, and combination refrigerators and freezers; self-contained room air conditioners for residential and light commercial air-conditioning and heat pumps; vending machines; and self-contained commercial ice machines, very low temperature refrigeration equipment, and water coolers;
- Isobutane (R-600a) in retail food refrigerators and freezers (stand-alone units only); household refrigerators, freezers, and combination refrigerators and freezers; and vending machines; and
- R-441A in retail food refrigerators and freezers (stand-alone units only); household refrigerators, freezers, and combination refrigerators and freezers; self-contained room air conditioners for residential and light commercial air-conditioning; heat pumps; and vending machines.

The most up-to-date list of substitutes that are exempt from the Clean Air Act Section 608 program can be found at <https://go.usa.gov/xXaZU>.

II. Summary of Recordkeeping by Appliance Charge Size

	5 pounds and Under	Between 5 and 50 Pounds	50 pounds and Over
Technician	None	Yes- Only for disposal of the appliance	Yes- Must provide records to the owner/operator that are generated by the technician
Owner/Operator	None	None	Yes
Appliance Disposal Facility	Yes	None	None

III. Recordkeeping and Reporting Requirements by Entity

All records that must be maintained under the Section 608 program must be available onsite at the respondents' place of business for a minimum of three years (or longer if specified). Records may be kept in hard copy or electronically. Electronic records may be off-site but must still accessible through the internet or other means at the specified site (e.g., site of the appliance or site of the disposal facility).

When reporting is required, EPA encourages entities to submit reports electronically to 608reports@epa.gov. Entities may also submit reports by mail to: Section 608 Program Manager; Stratospheric Protection Division; Mail Code: 6205T; U.S. Environmental Protection Agency; 1200 Pennsylvania Avenue, NW; Washington, DC 20460.

1) Refrigerant Reclaimers

A. Records

Refrigerant Reclaimers must maintain the following records:

- Records of the analysis conducted to verify that each batch of reclaimed refrigerant meets the necessary specifications in Appendix A of 40 CFR part 82, subpart F.
- Records on the names and addresses of persons sending refrigerant for reclamation and the quantity of each refrigerant (by ASHRAE type) sent for reclamation.

Additional Guidance: These requirements are specified in 40 CFR 82.164(d). These requirements are currently effective for ODS refrigerants and will apply to substitute refrigerants starting on January 1, 2018.

B. Reports or Other Submissions to EPA

- To become an EPA certified reclaimer, a reclaimer must submit a one-time application to EPA. The certification must include the name and address of the reclaimer and a list of equipment used to reclaim the refrigerant to the required standard, and to analyze the refrigerant to ensure it meets these specifications. The certification must also state that the reclaimer will:
 - ◆ Reclaim refrigerant to all the specifications in Appendix A of Subpart F that are applicable to that refrigerant;
 - ◆ Verify that each batch of refrigerant reclaimed meets these specifications using the analytical methodology prescribed in Appendix A;
 - ◆ Release no more than 1.5 percent of the refrigerant during the reclamation process;
 - ◆ Dispose of wastes from the reclamation process in accordance with all applicable laws and regulations; and
 - ◆ Maintain records and submit reports.

Additional Guidance: EPA has not developed a specific form for reclaimer applications.

- Annual reports noting the total annual quantity of material (the combined mass of refrigerant and contaminants) by refrigerant type sent to them for reclamation, the mass of refrigerant reclaimed by refrigerant type, and the mass of waste products produced.

Additional Guidance: These reports are due by February 1. EPA encourages reclaimers to use the Excel form found at <https://www.epa.gov/section608/major-recordkeeping-requirements-stationary-refrigeration> for this annual report. This requirement is specified in 40 CFR 82.164(d). These requirements are currently effective for ODS refrigerants and will apply to substitute refrigerants January 1, 2018. This means that the first report required for substitutes will be due in 2019.

- Notify EPA within 30 days of a change in business management, location, or contact information.

Additional Guidance: This requirement is specified in 40 CFR 82.164(c).

2) Refrigerant Wholesalers and Distributors

A. Records

Any person or company that sells or distributes, or offers to sell or distribute, any refrigerant must maintain the following records:

- Refrigerant sales records that indicate the name of the purchaser, the date of sale, and the quantity purchased as well as records indicating that the purchaser is a certified technician (as applicable).
- If the purchaser is not a certified technician, the wholesaler must maintain documentation that the purchaser is employed by a certified technician.

Additional Guidance: These requirements do not apply to sales of refrigerant that are exempt from the sales restriction, including small cans of MVAC refrigerant. These requirements are currently effective for ODS refrigerants and will apply to substitute refrigerants starting on January 1, 2018. This requirement is specified in 40 CFR 82.154(c)(3).

B. Reports or Other Submissions to EPA

EPA does not require the submission of any reports or other documents.

3) Technician Certification Programs

A. Records

- Records of the names and addresses of all individuals taking the tests, the scores of all certification tests administered, and the dates and locations of all testing administered.

Additional Guidance: These records must be retained indefinitely. This requirement is specified in 40 CFR Part 82, Subpart F, Appendix D.

B. Reports or Other Submissions to EPA

- Prepare a one-time application to become an approved technician certification program. The application will verify:
 - ◆ Ability to produce multiple versions of examinations for each test site;
 - ◆ Sufficient internal capacity to process the scoring and the accompanying documentation; and

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- ◆ Ability to ensure the confidentiality and security of test questions and answers.

Additional Guidance: EPA has not developed a specific form for technician certification program applications. This requirement is specified in 40 CFR Part 82, Subpart F, Appendix D. For questions on the application process, please contact 608reports@epa.gov.

- Publish online a list of technicians certified through the program, including:
 - ◆ First name, middle initial, and last name of the technician;
 - ◆ Technician's city of residence when taking the test;
 - ◆ Type(s) of certification received; and
 - ◆ Date each certification was completed.

Additional Guidance: This requirement does not apply to Federally-run programs. This list must be updated at least annually. Programs must provide notice to technicians that such information will be published online and allow technicians to opt out of being included. This requirement is specified in 40 CFR 82.161(b)(6).

- Report to EPA every six months on the pass/fail rate, by test Type, and the total number of technicians certified by that program.

Additional Guidance: Reports are due by January 30 and June 30. EPA encourages technician certifying programs to use the form found at <https://www.epa.gov/section608/major-recordkeeping-requirements-stationary-refrigeration> for this report. This requirement is specified in 40 CFR Part 82, Subpart F, Appendix D.

- Organizations that stop certifying technicians must transfer their records to another certifying program or EPA. Organizations that receive records from technician certification programs that have ceased operations must inform EPA within 30 days of the records being transferred.

Additional Guidance: This requirement is specified in 40 CFR Part 82, Subpart F, Appendix D.

4) Small Appliance Disposal Establishments

A. Records

Any person or company that is the final disposer of small appliances must maintain the following records:

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- Copies of signed statements attesting that refrigerant has been recovered prior to the disposal of each appliance. The signed statement must include the name and address of the person who recovered the refrigerant and the date the refrigerant was recovered; and/or
- Copies of contracts from a supplier of multiple appliances that refrigerant will be recovered prior to delivery at the disposal establishment or had been properly recovered prior to receipt by the supplier.

Additional Guidance: This requirement is specified in 40 CFR 82.155(c).

B. Reports or Other Submissions to EPA

EPA does not require the submission of any reports or other documents.

5) Technicians

A. Records

All certified technicians must maintain the following records:

- A copy of their Section 608 certification card must be maintained at their place of business.
Additional Guidance: This requirement is specified in 40 CFR 82.161(a)(4). This requirement is currently effective for ODS refrigerants and will apply to substitute refrigerants starting on January 1, 2018.
- Records on the disposal of appliances with charges between 5 and 50 pounds which include:
 - ◆ Company name, location of equipment, date of recovery, and type of refrigerant recovered for each appliance;
 - ◆ Total quantity of refrigerant recovered from such appliances each calendar month, by refrigerant type; and
 - ◆ Quantity of refrigerant transferred for reclamation or destruction (by refrigerant type), the person to whom it was transferred, and the date of transfer.

Additional Guidance: Technicians are not required to keep records on the disposal of appliances with a charge larger than 50 pounds. However, monthly totals may include refrigerant recovered from appliances with 50 or more pounds of refrigerant. There is no need to segregate refrigerant recovered from the different sized appliances if cylinder weighing is the preferred method of determining the monthly total. This requirement is effective January 1, 2018. This requirement is specified in 40 CFR 82.156(a)(3).

B. Reports or Other Submissions to EPA

EPA does not require the submission of any reports or other documents.

C. Third Party Reporting

Technicians must provide the following records to customers:

- For appliances that have a charge of 50 pounds or more of refrigerant, service invoices to owners/operators with:
 - ◆ The identity and location of the appliance;
 - ◆ The date and type of service performed;
 - ◆ The part of the appliance being serviced;
 - ◆ The name of the person performing the service; and
 - ◆ The quantity and type of refrigerant added (or removed in the case of disposal).

Additional Guidance: These records must be provided for all appliances that have a charge of 50 pounds or more. This requirement is effective January 1, 2019. Until that date, technicians must provide service invoices that at a minimum indicate the quantity of refrigerant added. This requirement is specified in 40 CFR 82.157(l).

- For appliances that have a charge of 50 pounds or more of refrigerant, records of leak inspections:
 - ◆ Date of inspections;
 - ◆ Method(s) used to conduct the leak inspection;
 - ◆ A list of the location of each leak that was identified; and
 - ◆ A certification that all visible and accessible parts of the appliance were inspected.

Additional Guidance: These records only need to be provided for appliances leaking above the threshold rate. This requirement is effective January 1, 2019. This requirement is specified in 40 CFR 82.157(l). EPA has not developed a sample form for such inspections.

- For appliances that have a charge of 50 pounds or more of refrigerant, records of all initial and follow-up verification tests:
 - ◆ The location of the appliance;
 - ◆ The date(s) of the verification tests;
 - ◆ The location(s) of all repaired leaks that were tested;
 - ◆ The type(s) of verification test(s) used; and

- ◆ The results of those tests.

Additional Guidance: These records only need to be provided for appliances leaking above the threshold rate. This requirement is effective January 1, 2019. This requirement is specified in 40 CFR 82.157(l). EPA has not developed a sample form for such tests.

6) Owners/Operators of Appliances with Charge Sizes of 50 or More Pounds

Until January 1, 2019, the previous recordkeeping and reporting provisions still apply. The required data items are specified in 40 CFR 82.166. After January 1, 2019, the revised reporting and recordkeeping provisions at 40 CFR 82.157(l) and (m) (as presented below) will apply.

EPA's regulations do not require owners/operators to maintain any records relating to appliances with less than 50 pounds of refrigerant.

A. Records

Owners and operators of appliances containing 50 or more pounds of refrigerant must maintain the following records:

- Records related to determining the full charge of an appliance, including:
 - ◆ The identification of the owner or operator of the appliance;
 - ◆ The address where the appliance is located;
 - ◆ The full charge of the appliance and the method for how the full charge was determined;
 - ◆ If using an established range for determining full charge, records must include the range for the full charge of the appliance, its midpoint, and how the range was determined; and
 - ◆ Any revisions of the full charge, how they were determined, and the dates such revisions occurred.

Additional Guidance: This requirement is specified in 40 CFR 82.157(l)(1).

- Service invoices with:
 - ◆ The identity and location of the appliance;
 - ◆ The date and type of service performed;
 - ◆ The part of the appliance being serviced;

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- ◆ The name of the person performing the service; and
- ◆ The quantity and type of refrigerant added (or removed in the case of disposal).

Additional Guidance: Technicians are required to provide these records, but owners/operators are required to maintain the records. Service invoices are not required for appliances with a charge of less than 50 pounds, even if larger appliances are present at the same facility. This requirement is specified in 40 CFR 82.157(l)(2).

- Records indicating the leak rate of the appliance, and the full charge used to calculate that leak rate

Additional Guidance: This record must be generated every time refrigerant is added to the appliance. This requirement is specified in 40 CFR 82.157(l)(2).

- Records from leak inspections triggered by the leak repair requirements.

- ◆ Date of inspections;
- ◆ Method(s) used to conduct the leak inspection;
- ◆ A list of the location of each leak that was identified; and
- ◆ A certification that all visible and accessible parts of the appliance were inspected.

Additional Guidance: These records are only required for appliances leaking above the threshold rate. Technicians are required to provide these records, but owners/operators are required to maintain the records. This requirement is specified in 40 CFR 82.157(l)(3).

- Owners/operators using an automatic leak detection system in lieu of leak inspections must maintain the following records:

- ◆ Records regarding the installation and the annual audit and calibration of the system; and
- ◆ A record of each date the monitoring system identified a leak and the location of the leak.

Additional Guidance: This requirement is specified in 40 CFR 82.157(l)(4).

- Owners or operators must maintain records of all initial and follow-up verification tests.

- ◆ The location of the appliance;
- ◆ The date(s) of the verification tests;
- ◆ The location(s) of all repaired leaks that were tested;
- ◆ The type(s) of verification test(s) used; and
- ◆ The results of those tests.

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Additional Guidance: These records are only required for appliances leaking above the threshold rate. Technicians are required to provide these records, but owners/operators are required to maintain the records. This requirement is specified in 40 CFR 82.157(l)(5).

- A copy of retrofit/retirement plans (if applicable). Plans must include:
 - ◆ Identification and location of the appliance;
 - ◆ Type and full charge of the refrigerant used in the appliance;
 - ◆ Type and full charge of the refrigerant to which the appliance will be converted, if retrofitted;
 - ◆ Itemized procedure for converting the appliance to a different refrigerant, including changes required for compatibility with the new substitute, if retrofitted;
 - ◆ Plan for the disposition of recovered refrigerant;
 - ◆ Plan for the disposition of the appliance, if retired; and
 - ◆ One-year schedule for completion of the appliance retrofit or retirement.

Additional Guidance: These records are only required for appliances leaking above the threshold rate. This requirement is specified in 40 CFR 82.157(h)(2).

- A copy of any requests for extensions to the 30-day repair timeline or the one-year retrofit/retire timeline (as applicable).

Additional Guidance: This requirement is specified in 40 CFR 82.157(l)(7). A description of the contents of the request is found under the reporting section below.

- Records when appliances are mothballed to suspend a regulatory deadline, including:
 - ◆ The date when a system is mothballed; and
 - ◆ The date when refrigerant is added back into the system.

Additional Guidance: This requirement is specified in 40 CFR 82.157(l)(8).

- Records on purged or destroyed refrigerant, including:
 - ◆ Information on flow rate, quantity or concentration of the refrigerant in the vent stream; and periods of purge flow;
 - ◆ The identification of the facility and a contact person, including the address and telephone number;
 - ◆ A description of the appliance, focusing on aspects relevant to the purging of refrigerant and subsequent destruction;

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- ◆ A description of the methods used to determine the quantity of refrigerant sent for destruction and type of records that are being kept by the owners or operators where the appliance is located;
- ◆ The frequency of monitoring and data-recording; and
- ◆ A description of the control device, and its destruction efficiency.

Additional Guidance: This requirement is specified in 40 CFR 82.157(l)(9).

- Records documenting an owner/operator is using the seasonal variance flexibility.

Additional Guidance: This requirement is specified in 40 CFR 82.157(l)(10).

B. Reports or Other Submissions to EPA

- Report to EPA when an appliance loses more than 125 percent of its total charge within a calendar year.
 - ◆ The report must describe efforts to identify leaks and repair the appliance.

Additional Guidance: The first report of any appliance leaking 125% or more would be due March 1, 2020, for leaks that occurred over 2019. The report could include records generated during the course of repairing the appliance (e.g., requests for extensions, retrofit/retirement plan, etc.). EPA has not developed a specific form for this report. The report must demonstrate that the owner/operators is in compliance with the repair provisions or the retrofit or retirement provisions of this program. This requirement is specified in 40 CFR 82.157(j).

- Requests for extensions to the 30-day repair timeline (or 120 days in the event of an IPR shutdown). Submissions include the following information:
 - ◆ Date of notification to EPA;
 - ◆ Identification of the appliance;
 - ◆ Name of the owner or operator;
 - ◆ Leak rate;
 - ◆ Method used to determine the leak rate and full charge;
 - ◆ Date a leak rate above the applicable allowable rate was discovered;
 - ◆ Location of leaks(s) to the extent determined to date;
 - ◆ Any repair work that has been finished thus far, including the date that work was completed;
 - ◆ Reasons why more than 30 days (or 120 in the event of an IPR shutdown) is necessary to complete the repair; and

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- ◆ Estimate of when the repair will be completed.

Additional Guidance: A request for extension will be considered approved unless EPA notifies the owners or operators otherwise. The request must be provided within the 30-day (or 120-day, if applicable) repair timeframe. Owners and operators can request subsequent extensions if they provide EPA with documentation of the reason for the extension within 30 days of identifying the need for the subsequent extension. This requirement is specified in 40 CFR 82.157(f).

- Requests for extensions to the one-year retrofit/retire timeline. Submissions include the following information:

- ◆ Date of notification to EPA;
- ◆ Identification of the appliance;
- ◆ Name of the owner or operator;
- ◆ Leak rate;
- ◆ Method used to determine the leak rate and full charge;
- ◆ Date a leak rate above the applicable allowable rate was discovered;
- ◆ Location of leaks(s) to the extent determined to date;
- ◆ Any repair work that has been finished thus far, including the date that work was finished;
- ◆ Plan to finish the retrofit or retirement of the system;
- ◆ Reasons why more than one year is necessary to retrofit or retire the system; and
- ◆ An estimate of when retrofit or retirement work will be finished.

Additional Guidance: A request for extension will be considered approved unless EPA notifies the owners or operators within 60 days of receipt of the request. The request must be provided within seven months of discovering that the appliance exceeded the threshold leak rate. Owners and operators can request subsequent extensions if they provide EPA with documentation of the reason for the extension within 30 days of identifying the need for the subsequent extension. The elements of this request are the same as the request for an extension to the 30-day repair timeframe except that this request must also include a copy of the retrofit/retirement plan. See the recordkeeping section above for required elements of a retrofit/retirement plan. This requirement is specified in 40 CFR 82.157(i).

- Requests to cease a retrofit/retirement if all leaks are repaired. Submissions include the following information:

- ◆ The retrofit or retirement plan;
- ◆ The date that the requirement to develop a retrofit or retirement plan was triggered;

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- ◆ The leak rate;
- ◆ The method used to determine the leak rate and full charge;
- ◆ The location of the leak(s) identified in the leak inspection;
- ◆ A description of repair work that has been completed;
- ◆ A description of repair work that has not been completed;
- ◆ A description of why the repair was not conducted within the 30-day (or 120-day) timeframes, including any possible extensions;
- ◆ A statement signed by an authorized official that all identified leaks will be repaired; and
- ◆ An estimate of when those repairs will be completed (not to exceed one year from date of the plan).

Additional Guidance: Owners and operators can request relief within 180 days of the plan's creation date. The request will be considered approved unless EPA notifies the owners or operators within 60 days of receipt of the request that it is not approved. This requirement is specified in 40 CFR 82.157(h)(5).

- Notice when excluding purged refrigerants that are destroyed from annual leak rate calculations.

Additional Guidance: See above for required elements of such notice. The owner/operator must notify EPA within 60 days after the first time the exclusion is used by the facility where the appliance is located. This requirement is specified in 40 CFR 82.157(l)(9).

7) Small Can Manufacturers

A. Records

Small can manufacturers must maintain the following records:

- Log forms detailing results from self-sealing valve testing.

Additional Guidance: EPA has prepared a sample form found at <https://www.epa.gov/section608/major-recordkeeping-requirements-stationary-refrigeration> for these records. This requirement is specified in 40 CFR 82.154(c)(2) and in 40 CFR Part 82, Subpart F, Appendix E.

B. Reports or Other Submissions to EPA

EPA does not require the submission of any reports or other documents.

8) Refrigerant Recovery/Recycling Equipment Testing Organizations

A. Records

Organizations that test refrigerant recovery/recycling equipment must maintain the following records:

- Records of refrigerant recovery/recycling equipment testing and performance.
- List of certified refrigerant recovery/recycling equipment that includes the name of the manufacturer and the name or serial number of the model line.

Additional Guidance: This requirement is specified in 40 CFR 82.160(e).

B. Reports or Other Submissions to EPA

- Application for approval by EPA to certify refrigerant recovery/recycling equipment (as applicable). Information includes:
 - ◆ List refrigerant recovery/recycling equipment present at the organization that will be used for testing;
 - ◆ Verification of expertise in refrigerant recovery/recycling equipment testing and the technical experience of the organization's personnel;
 - ◆ Verification of the organization's knowledge of the standards and recordkeeping and reporting requirements in 40 CFR Part 82, Subpart F; and
 - ◆ Description of the organization's program for verifying the performance of certified recycling and recovery equipment manufactured over the long term, specifying whether retests of equipment or inspections of equipment at manufacturing facilities will be used;
 - ◆ Verification that the organization has no conflict of interest and receives no direct or indirect financial benefit from the outcome of certification testing; and
 - ◆ Agreement to allow EPA access to records and personnel to verify the information contained in the application.

Additional Guidance: EPA has not developed a specific form for reclaimer applications. This requirement is specified in 40 CFR 82.160(b).

- Notice of when a previously certified model of refrigerant recovery/recycling equipment fails a three-year recertification test.

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Additional Guidance: This notice must be provided to EPA within 30 days of retesting or inspection. This requirement is specified in 40 CFR 82.160(e).

- Publish online a list of all equipment certified by that organization that includes the name of the manufacturer and the name or serial number of the model line.

Additional Guidance: The testing organization must update the list published online annually. Online lists must contain certified equipment until three years after that equipment is no longer offered for sale. This list does not need to be submitted to EPA. This requirement is specified in 40 CFR 82.160(e).