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EPA 608/609 Training and Certification

American Bus Association's Bus Industry Safety Council

By Liz Abbott and Chad Maloney

KPA EHS Operations Team



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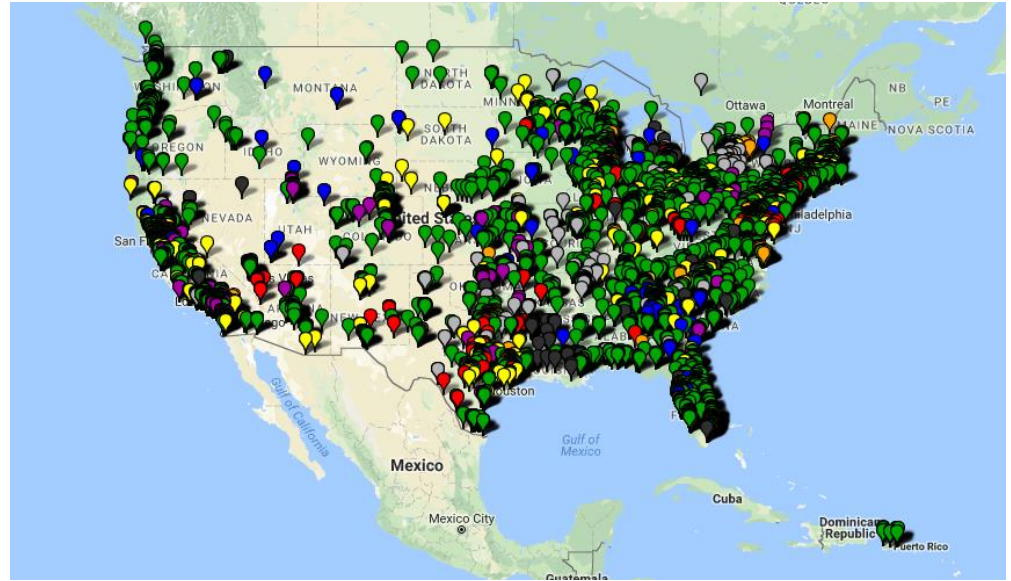


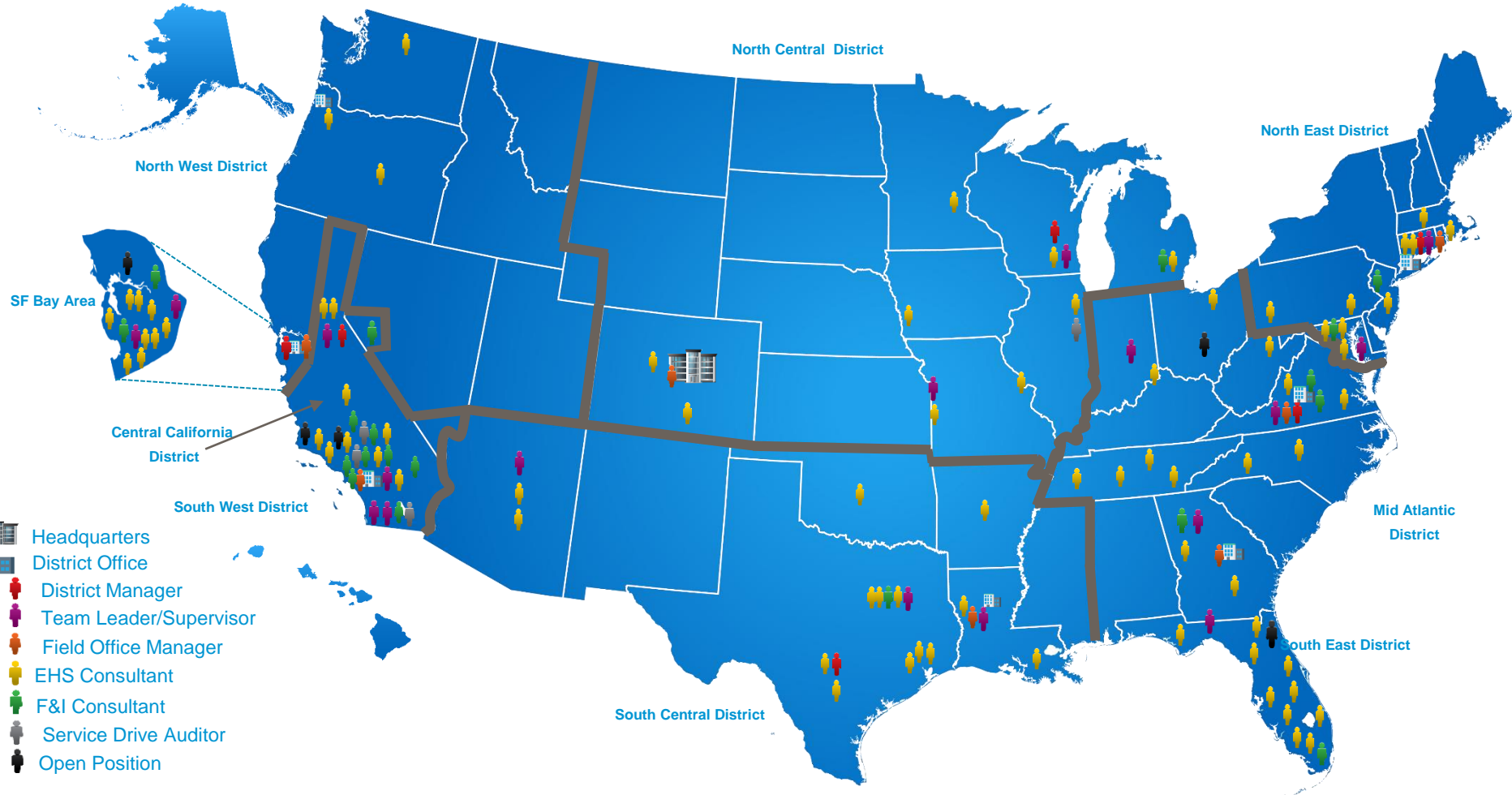
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Who We Are

- Risk Management and Compliance Experts based out of Lafayette, CO
- Founded in 1986
- 10,000 + clients nationwide
- Owned by Providence Equity Partners
- Business Lines
 - Environmental Health and Safety (EHS)
 - Sales and Finance Compliance
 - Human Resource Management





Agenda

- ✓ Clean Air Act
 - ✓ Section 608 of the CAA: Stationary Refrigeration and Air Conditioner
 - ✓ Section 608 of the CAA: Training and Certification
 - ✓ Section 609 of the CAA: Motor Vehicle Air Conditioning
 - ✓ Section 609 of the CAA: Training and Certification
 - ✓ Requirements to Purchase Refrigerant
 - ✓ Penalties

Clean Air Act (CAA)

- Amendment became part of the CCA in 1990
- Purpose is to protect the ozone layer from harmful ozone-depleting substances through..
 - Phasing out the “most-damaging” substances
 - Banning such substances that are part of nonessential products
 - Prohibiting the release of ozone-depleting refrigerants
 - Ensuring proper handling/disposal of refrigeration equipment



Section 608 of the CAA: Stationary Refrigeration and Air Conditioning

“Section 608 prohibits individuals from intentionally venting ozone-depleting substances (ODS) refrigerants (including CFCs and HCFCs) and their substitutes (such as HFCs), while maintaining, servicing, repairing, or disposing of air conditioning or refrigeration equipment”

- Appliances that use any of the following ODS are subject to the venting, capturing, and disposal requirements of Section 608
 - Class I CFC (R-12)
 - Class II HCFC (R-22) or HFC (134a)

Section 608 of the CAA: Training and Certification

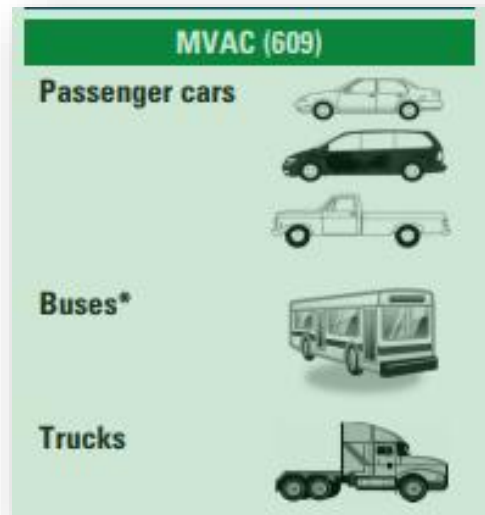
- Buses that use R-22 are not MVACs
 - Section 608 Type II (High-Pressure) Training and Certification
- EPA website for training centers
- Does not expire
- Replacement cards available
- Apprentices do not need certification
- Purchasing of R-22 must be done by a “certified technician”



Section 609 of the CAA: Motor Vehicle Air Conditioning (MVAC)

“Because of the potential damage that refrigerants can do to the environment, Section 609 of the Clean Air Act (CAA) directs EPA to establish requirements to prevent the release of refrigerants during the servicing of MVACs and MVAC-like appliances and to require recycling of used refrigerants.”

- Older model vehicles using CFC-12 (Freon)
- Majority of vehicles use HFC-134a
- HFO-1234yf



Section 609 of the

- Servicing/repairing
 - Venting is prohibited
 - Recovered refrigerant
 - Off-site reclamation
 - Refrigerant recovery registered for use
- EPA approved training

CERTIFICATION OF ACQUISITION/RECOVERY, RECOVERY/RECYCLE OR RECOVERY/RECYCLE/RECHARGE EQUIPMENT CERTIFICATION FORM

1 _____
NAME OF ESTABLISHMENT

STREET

CITY, STATE, ZIP CODE

TELEPHONE NUMBER

2 _____
NAME OF EQUIPMENT MANUFACTURER & MODEL NUMBER

_____ SERIAL NUMBER(S) _____ YEAR

3 I certify that I have approved recovery, recovery/recycle, or recovery/recycle/recharge equipment under Section 609 of the Clean Air Act. I certify that only properly trained and certified technicians operate the equipment and that the information given above is true and correct.

_____ SIGNATURE OF OWNER/OPERATOR _____ DATE

_____ NAME (PRINT) _____ TITLE

SEND THIS FORM TO THE EPA REGIONAL OFFICE LISTED UNDER YOUR STATE OR TERRITORY IN WHICH THE ESTABLISHMENT IS LOCATED.

MAILING ADDRESSES CAN BE FOUND ON THE REVERSE SIDE OF THIS FORM.

MVAC RECOVERY, RECOVERY/RECYCLE OR RECOVERY/RECYCLE/RECHARGE EQUIPMENT CERTIFICATION FORM INSTRUCTIONS

Motor vehicle refrigerant recovery, recovery/recycle, or recovery, recycle, recharge equipment must be acquired by January 1, 1992 and certified to EPA on or before January 1, 1993 under Section 609 of the Clean Air Act. To certify your equipment, please complete the above form according to the following instructions and mail to the appropriate EPA region based on where your establishment is located.

- 1 Please provide the name, address, and telephone number of the establishment where the equipment is located.
- 2 Please provide the name brand, model number, year and serial number(s) of the equipment acquired for use at the above establishment.
- 3 The certification statement must be signed by the person who has acquired the equipment (the person may be the owner of the establishment or another responsible officer). The person who signs is certifying that they have acquired the equipment, that each individual authorized to use the equipment is properly trained and certified, and that the information provided is true and correct.

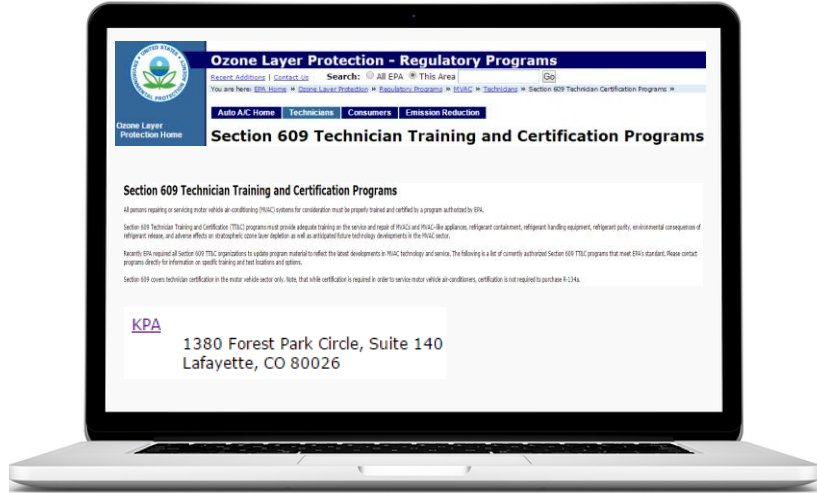
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ore recharge

mer

by the EPA and

AC Section 609 Training Available!



Unlimited
employee training

Ability to
track training

Certificates
saved online

NEW! R-1234yf Training Available



Training course will familiarize employees with R-1234yf components and highlight the differences from existing R-134a systems

2.2. Label elements

Regulation (EC) No. 1272/2008

Hazard Pictogram:



Signal word: Danger
Hazard statements: H220: Extremely Flammable

Requirements to Purchase Refrigerant

- ODSs
 - Section 608 trained and certified technicians
 - Intended for use in stationary refrigeration
- MVAC Refrigerant
 - Section 609 trained and certified technicians
 - 2lbs or less of refrigerant to DIYers without certification

Penalties

- Civil Administration Actions

2010
July 29, 2011: [Miami Man Sentenced to 18 Months in Prison for Smuggling Refrigerant](#)

Brendan Clery was sentenced to 18 months in prison for illegally importing HCFC-22 into the United States. He was also ordered to pay a \$40,000 criminal fine and forfeit illegal proceeds exceeding \$900,000. Clery illegally smuggled approximately 20,460 cylinders of restricted HCFC-22 with a market value of \$1,438,270. At no time did Clery, or his company Lateral Investments, hold unexpended consumption allowances that would have allowed them to legally import the refrigerant. This case is part of a larger criminal investigation known as "Operation Catch-22."

The company will also pay a \$900,000 civil penalty.

Questions?

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