



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

DATE: NOV 09 2018

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
I Cool USA, Hartselle, Alabama

FROM: Jason Schenandoah, Environmental Engineer
AECAB (IL/IN)

THRU: Nathan Frank, Section Chief
AECAB (IL/IN)

TO: File

BASIC INFORMATION

Facility Name: I Cool USA

Facility Location: 1638 Thompson Road, Hartselle, Alabama

Date of Inspection: September 21, 2018

EPA Inspector(s):

1. Jason Schenandoah, Environmental Engineer

Other Attendees

1. Richard Miller, Vice President, ICool USA Incorporated

Contact Email Address: Richard.miller@icoolproductsusa.com

Purpose of Inspection: To determine compliance with the Clean Air Act

Facility Type: Refrigerant packaging facility

Regulations Central to Inspection: 40 C.F.R. Part 82

Arrival Time: 9:05 am

Departure Time: 10:15 am

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from Richard Miller unless otherwise noted.

Company Ownership: I Cool USA (I Cool) is an Alabama corporation owned by a Chinese parent company.

Process Description:

I Cool sells 3 different final product refrigerants from the Hartselle, Alabama facility to distributors: R-410A; R-404A; and R-407C. All component and final product refrigerants are stored in a storage tank farm. Each final product refrigerant is blended to specifications on site. The component refrigerants in the final product refrigerants are imported from China and Europe. After blending, the final product refrigerants are tested in a lab using 2 gas chromatographers for blend content and air content and a Karl Fischer unit is used to measure moisture. If the refrigerant meets specifications, the refrigerant is then sent to one of 18 filling stations. At the filling stations, a vacuum is pulled on cylinders before the cylinders are filled with refrigerant. Each filling station has a scale to ensure each cylinder has the proper amount of refrigerant, usually 25 lbs. cylinders.

I Cool also makes insulated copper tubing. Copper tubing is purchased from the United States, Korea, and Vietnam sources. Insulation is purchased from United States and China sources. Copper tubing is un-coiled, wrapped with insulations, then re-coiled and packaged for sale.

Staff Interview: EPA asked about refrigerant product R-462A that I Cool has advertised. Mr. Miller informed EPA that R-462A has not been brought into the United States. I Cool did not introduce sales of R-462A because they were waiting on a patent to be approved. I Cool intends to import R-462A from overseas. Mr. Miller told EPA that he is aware of the Significant New Alternatives Policy (SNAP) program.

TOUR INFORMATION

EPA toured the facility: Yes

Data Collected and Observations:

Filling stations were not operational during the inspection. Mr. Miller informed EPA that I Cool was working on improvements to their filling stations. There were several boxes of R-134A product in I Cool cylinders. Mr. Miller told EPA that those cylinders were brought into the United States by the parent company before I Cool USA was formed and that the cylinders are just stored in the warehouse. Some 800 lbs. tanks were in the warehouse, Mr. Miller informed

EPA that the tanks are for customers who prefer large containers; the tanks are returnable. 6 – 680 kg tanks storing R-32 were in the warehouse. Mr. Miller told EPA that the tanks were from before the storage tank farm was constructed.

Photos and/or Videos: were not taken during the inspection.

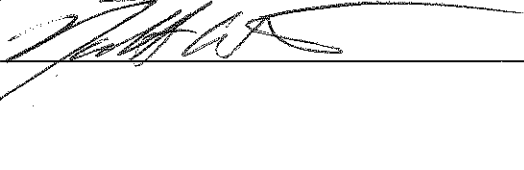
Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

Compliance Assistance: EPA informed Mr. Miller that R-462A will need SNAP approval before I Cool can introduce it into commerce.

SIGNATURES

Report Author:  Date: 11/6/18

Section Chief:  Date: 11/7/18

