

From: Jones, Enesta [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=65B8E6C6E5CA4A7A9AE85D98A4C8EEDB-EJONES02]
Sent: 12/7/2017 8:44:36 PM
To: Ex. 6
CC: Press [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b293283291dc44e0b5d1c36be9281d8a-Press]
Subject: Re: Refrigerant Recycling

Hi Wayne, attributable to an EPA spokesperson:

Which refrigerants must be recycled for automotive use? Which refrigerants must be recycled for residential use (appliances, etc.)? What about HFO-1234yf?

Response: Different provisions for the handling and recovery of refrigerants apply depending on the type of appliance being serviced. Section 609 of the Clean Air Act covers servicing and recovery standards for all refrigerants used in motor vehicle air conditioners (MVACs). Section 608 covers servicing, recovery, and recycling/reclamation standards for non-exempt refrigerants (exempted refrigerants include water, carbon dioxide, etc.) used in all other appliances, including for residential uses. Section 608 also covers disposal of all appliances containing non-exempt refrigerants. The Clean Air Act generally prohibits the venting or knowing release of ozone-depleting refrigerants and their substitutes during the maintenance, servicing, repair, or disposal of an appliance. While EPA has exempted some refrigerants from this prohibition when used in specific applications, venting is prohibited for most refrigerants including ozone-depleting substances such as R-22, hydrofluorocarbon (HFC) refrigerants such as HFC-134a and R-410A, and the refrigerant HFO-1234yf. Recycling is not mandated for any refrigerant. However, EPA requires non-exempt refrigerant be recovered from appliances at the end of their life. Once recovered, these non-exempt refrigerants should be properly disposed of, recycled, or sent for reclamation. The specific practices for evacuation (40 CFR 82.156) and safe disposal of appliances (40 CFR 82.155) currently apply to appliances containing an ozone-depleting refrigerant and will apply to appliances containing non-exempt substitute refrigerants beginning on January 1, 2018.

All refrigerants recovered from MVACs can be recovered and recycled on-site before being recharged into another MVAC. This is not the case for refrigerant recovered from other residential and commercial refrigeration and air conditioning equipment. Before recovered refrigerant is put into another entity's equipment, it must first be sent to an EPA-certified reclaimer for reclamation. Reclaimers process the used refrigerant to "clean" the refrigerant and verify that it meets the required specifications. Used refrigerant that has not been properly reclaimed can damage equipment.

What are the regulations regarding the removal of refrigerants prior to disposal for residential appliances?

Response: The requirements for removal of refrigerants prior to disposal of residential appliances can be found at 40 CFR 82.156. Refrigeration and air-conditioning equipment that is typically dismantled on-site before disposal (such as central residential air conditioning) must have refrigerant recovered using certified recovery equipment in accordance with EPA's requirements for servicing prior to disposal. Generally, a 608 certified technician would need to evacuate the refrigerant from the appliance using certified recovery equipment and send that refrigerant for reclamation or disposal.

What are the regulations regarding the removal of refrigerants prior to disposal for passenger cars, light trucks, and commercial vehicles?

Response: Equipment that typically enters the waste stream with its refrigerant charge intact (e.g., MVACs (including light duty trucks), household refrigerators and freezers, and window unit air conditioners) are subject to special safe disposal requirements. The final person in the disposal chain (such as a scrap metal recycler or landfill owner) is responsible for ensuring that refrigerant is recovered from the equipment before its final disposal. If the final person in the disposal chain accepts an appliance that no longer holds a refrigerant charge, that person is responsible for maintaining a signed statement from the person who dropped off the appliance. The signed statement must include the name and address of the person who recovered the refrigerant, and the date that the refrigerant was recovered.

Alternatively, this could be a copy of a contract stating that the refrigerant will be removed prior to delivery. These requirements are outlined at 40 CFR 82.155.

Individuals removing refrigerant from small appliances, MVACs, and MVAC-like air conditioners (for example, air-conditioning equipment found on agricultural or construction vehicles), when preparing them for disposal, are not required to be certified technicians. However, the equipment used to recover refrigerant from appliances prior to their final disposal must meet the same performance standards as refrigerant recovery equipment used for servicing.

MVAC and MVAC-like appliances would also be covered by the evacuation requirements discussed in response to the previous question (see 40 CFR 82.156). More information on the overlap between the section 608 and section 609 requirements can be found at <https://www.epa.gov/section608/overlap-between-section-608-and-section-609>.

Could you suggest sources online or live?

Response: You can find more information on stationary refrigeration and air conditioning here: <https://www.epa.gov/section608>

You can find more information on MVAC system servicing here: <https://www.epa.gov/mvac>

From: WHI [Ex. 6]
Sent: Monday, November 27, 2017 2:46 PM
To: Lynn, Tricia <lynn.tricia@epa.gov>
Subject: Re: Refrigerant Recycling

Of course, deadline is Dec. 7 for the "Cooling Journal," which is published for an audience of small businesses in the business of servicing automotive air conditioning components for transportation and industry. Publisher is NARSA -- The International Heat Exchange Association. The residential portion will be an add on or I will do it on spec and find a home for it in residential and appliance HVAC business.

On Mon, Nov 27, 2017 at 1:48 PM, Lynn, Tricia <lynn.tricia@epa.gov> wrote:

In addition to your deadline, can you please also share which outlet you're with?

Thank you!

From: Lynn, Tricia
Sent: Monday, November 27, 2017 1:46 PM
To: 'WHI' [Ex. 6]
Subject: RE: Refrigerant Recycling

Hi Wayne—

Thanks for your inquiry. Can you please share your hard deadline?

Best,

Tricia

Tricia Lynn

Office of Public Affairs

U.S. EPA

Office: 202.564.2615

From: WHI [Ex. 6]
Sent: Monday, November 27, 2017 9:52 AM
To: Lynn, Tricia <lynn.tricia@epa.gov>
Subject: Refrigerant Recycling

Hello:

I am working on a story about refrigerants for automotive and residential uses. In particular I would like to know which refrigerants must be recycled for automotive use? Which refrigerants must be recycled for residential use (appliances, etc.)? What are the regulations regarding the removal of refrigerants prior to disposal for residential appliances? For passenger cars and light trucks? For commercial vehicles? Could you suggest sources online or live? Thank you.

--

Wayne Juchno, CAE



Ex. 6

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Wayne Juchno, CAE



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