

EPA's Refrigerant Management Requirements

What Refrigerant Distributors and Wholesalers Need to Know



What are Sections 608 and 609?

Section 608 of the Clean Air Act prohibits the knowing release of refrigerant during the maintenance, service, repair, or disposal of air-conditioning (AC) and refrigeration equipment. EPA requires proper refrigerant management practices by those who buy or sell refrigerant, technicians, owners and operators of AC and refrigeration systems, and others. These requirements apply for all refrigerants that contain ozone-depleting substances, e.g., hydrochlorofluorocarbons (HCFCs), and non-exempt substitute refrigerants, e.g., hydrofluorocarbons (HFCs), hydrofluoroolefins (HFOs) and blends thereof.

Some refrigerants are exempt from the refrigerant management requirements. Examples include carbon dioxide, nitrogen, and water. For a full list of exempt refrigerants, see 40 CFR § 82.154(a).

Section 609 of the Clean Air Act directs EPA to establish servicing practices to prevent the release of all refrigerants, including those that are exempt under the Section 608 regulations, for motor vehicle air conditioners (MVACs) and MVAC-like¹ appliances. When payment of any kind is involved (including non-monetary), any person working on an MVAC must be certified under Section 609 and they must use approved refrigerant handling equipment.

What are the Section 608 refrigerant management requirements for refrigerant distributors and wholesalers?²

Refrigerant distributors and wholesalers must comply with the following provisions. These provisions did not change as a result of EPA's 2020 update.

Refrigerant distributors and wholesalers must:

- Only sell or distribute non-exempt refrigerants to technicians certified under Sections 608 or 609 of the Clean Air Act, where individuals may only purchase refrigerant consistent with the appliances covered by their certification.
 - There is an exception for small cans (under two pounds) of substitute refrigerant, which can be sold to individuals for use in a MVAC if the can has a self-sealing valve.
- Keep invoices that indicate the name of the purchaser, sale date, and the quantity of non-exempt refrigerant purchased, unless they are selling exempt substitutes or small cans of MVAC refrigerant equipped with self-sealing valves.
- Keep documentation verifying that a purchaser is, or employs, a certified technician for three years.
- Not sell or distribute any non-exempt used refrigerant unless it: has been reclaimed by a certified reclaimer; is being transferred to equipment belonging to the same owner; or was used only in a MVAC or MVAC-like appliance and was recycled.³

¹ MVAC-like appliances are mechanical vapor compression, open-drive compressor appliances used to cool the driver's or passenger's compartment of a non-road vehicle, including agricultural and construction vehicles.

² This fact sheet highlights select provisions that may be of most interest to this community. Please see the regulations at <https://go.usa.gov/xpKhq> for the full requirements.

³ This does not apply to the sale of used refrigerant for reclamation or destruction.

Additional Resources

Updates to the Refrigerant Management Program:

www.epa.gov/section608/revised-section-608-refrigerant-management-regulations

Refrigerant Sales Restriction: www.epa.gov/section608/refrigerant-sales-restriction

Section 609 Regulatory Requirements:

www.epa.gov/mvac/epa-regulatory-requirements-mvac-system-servicing

Contact EPA: www.epa.gov/section608/forms/contact-us-about-stationary-refrigeration-and-air-conditioning