

 Trinity Consultants is a leading global environmental consulting firm that brings 50 years of experience providing services and solutions in the EHS Regulatory Compliance, Built Environment, Life Sciences, and Water & Ecology markets. Trinity has the technical expertise, industry depth, and specialized capabilities to help clients achieve their goals across the natural and built environments.

## Refrigerant Management Expertise

On October 11, 2024, U.S. EPA (EPA) finalized the 40 CFR 84, Subpart C Management of Regulated Substances requirements [more commonly known as the Hydrofluorocarbon (HFC) Management Rule]. This rule requires owners and operators of covered appliances to meet certain servicing, repair, disposal and installation requirements in order to minimize the release of HFCs and substitutes with a global warming potential (GWP) greater than 53. Entities that may be affected by this final rule include those that own, operate, service, repair, recycle, dispose, or install equipment containing HFCs or their substitutes with a GWP > 53, as well as those that recover, recycle, or reclaim HFCs.

These requirements are in addition to the existing refrigeration requirements that have been in effect for many years now under 40 CFR 82, Subpart F for Class I and Class II ozone depleting substances (ODS) and non-exempt substitutes

Trinity is an expert in refrigerant compliance associated with 40 CFR 82, Subpart F and 40 CFR 84, Subpart C. Due to the common use of refrigerant containing equipment (e.g., air conditioning units, industrial refrigeration equipment, chillers), these regulations are far-reaching, and the compliance obligations are commonly misunderstood.

To add even more complexity, some state agencies have developed their own refrigerant management rules. These states and others have joined the U.S. Climate Alliance, which is a bipartisan coalition of governors focused on reducing greenhouse gas emissions.

As a result, Trinity has identified that the compliance burden surrounding refrigerant management has significantly increased in the last three decades. Thereby, we have established a team of consultants focused on helping our clients develop compliance programs to meet these regulations.

Trinity provides support and guidance for clients helping them achieve compliance with these regulations. The following sections explain some of our services related to refrigerant management compliance.



## Refrigerant Management Services

### Refrigerant Compliance Program and Operating Procedures

Trinity works with clients to develop an inventory of refrigerant containing equipment. Trinity uses this inventory to develop a site-specific compliance program outlining applicable monitoring, inspection, disposal, recordkeeping, and reporting requirements.

### Compliance Audits and Gap Assessments

Trinity assists clients in determining their compliance status with respect to the refrigerant rules. Trinity performs both comprehensive audits of refrigerant management programs as well as high level gap assessments to determine potential compliance issues. These audits and gap assessments typically include in-person site visits to identify applicable appliances to review compliance documentation, and to evaluate current compliance practices and site-specific procedures. Both assessments help companies gain an understanding of the necessary steps to come into compliance with 40 CFR 82 and 40 CFR 84 specifically tailored to their site. Trinity also assists facilities to resolve compliance gaps found with respect to any other sections of the rule (MVAC, labeling, halons, fire suppression systems, etc.) during assessments/audits.

### CoolTracker365™ Implementation

Trinity's CoolTracker365™ is a Microsoft Excel®-based tool designed to track compliance with Subpart F and Subpart C (coming in 2026) for stationary refrigeration appliances. This tool helps facilities manage compliance with the leak repair requirements of 40 CFR 82.157 and 40 CFR 84.106, as well as documenting appliance disposal and off-site refrigerant transfer. Trinity has implemented this tool for many clients to help them manage their programs and to facilitate compliance. For more information on this tool, please visit our website and our CoolTracker365™ service sheet.

## Refrigerant Reporting Support

40 CFR 82, Subpart F and 40 CFR 84, Subpart C require reporting when certain appliances containing a regulated refrigerant leak  $\geq 125\%$  of their full refrigerant charge during the calendar year. The "Chronic Leaker Report" must be submitted by March 1 of the following year. Trinity supports clients with developing Chronic Leaker Reports, including determining whether reporting is triggered, gathering the necessary data, and preparing the report.

Additionally, any entities importing HFCs who either hold allowances or have been granted allowances to import from other companies must report both quarterly and annually to EPA regarding the amounts and types of refrigerants imported. Trinity has assisted several clients in making these reports and uploading the data to EPA's online systems.

## Refrigerant Management Training

Trinity provides refrigerant management training to environmental professionals, maintenance staff, and refrigerant technicians (including contractors). This training outlines what the rule requires regarding compliance, such as leak repair, recordkeeping, and reporting requirements, as well as best practices for program management and common pitfalls. Trinity presents a formal in-person and webinar-based course called "**Compliance Workshop for Refrigerants & Ozone Depleting Substances**" several times a year. Additionally, Trinity has developed custom training courses for companies based on their specific operations.

## Evaluating Refrigerant Phasedown Exposure

As of January 1, 2020, the production and import of R-22 (the most commonly used refrigerant in stationary appliances) and R-142b ceased. A 99.5% percent reduction from baseline for all other Class II ODS, or hydrochlorofluorocarbons (HCFCs) was also implemented.

EPA's new focus is on the phasedown of Greenhouse Gas (GHG) refrigerants, including hydrofluorocarbons (HFCs). Due to the reduced supply and increased cost of all refrigerants, Trinity is assisting clients with evaluating their exposure to minimize risk and to maximize cost savings through development of an appliance scorecard and refrigerant reduction strategy evaluation.

Example metrics used in the evaluation include:

- Refrigerant-containing appliance specifications (e.g., age, refrigerant type/charge)
- Availability of next generation/alternative refrigerants [e.g., hydrocarbons and hydrofluoroolefins (HFOs)]
- Retrofit options from appliance manufacturers and refrigerant contractors

Trinity can also incorporate sustainability metrics into the evaluation, including refrigerant global warming potential (GWP), "stored" carbon dioxide equivalent (CO<sub>2e</sub>), and actual leaked CO<sub>2e</sub>. A thorough evaluation provides clients with an understanding of the potential impact of the phasedowns and suggested actions to prepare.

Trinity has also worked with several equipment manufacturers to determine how the phasedown affects their ability to manufacture and import appliances and products using HFCs and substitutes. These evaluations are designed to ensure that products meet required phasedown deadlines under the Technology Transitions Rule (40 CFR 84, Subpart B) and are approved substitutes under the Significant New Alternatives Policy (SNAP) Program under 40 CFR 82, Subpart G. Trinity has evaluated phasedown applicability at the state and international levels.

## Why Choose Trinity

In short, there is no better choice for your EHS needs. Our experience is multi-faceted and extensive. Our strategies are innovative, time saving, and cost-effective. Our staff and tools are the best in the business.

**ISO 9001:2015 certified at our corporate office in Dallas, Texas**

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### CONTACT OUR TEAM!

For more information about how we can help your organization, please contact us.

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