

CoolTracker 365™ Refrigerant Tracking Tool

 **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.

Trinity's CoolTracker 365™ Tool is a Microsoft® Excel®-based tool designed to track compliance with 40 CFR Part 82, Subpart F (Subpart F) for stationary refrigeration appliances. While CoolTracker 365 is geared toward compliance with the leak repair requirements of 40 CFR 82.157, documentation of appliance disposal and off-site refrigerant transfer can also be maintained within the tool.

The Subpart F leak repair requirements apply to all appliances (i.e., independent circuits) containing a Class I (e.g., chlorofluorocarbon, CFC) or Class II (e.g., hydrochlorofluorocarbon, HCFC) refrigerant or blends containing a Class I or Class II refrigerant with a full charge ≥ 50 pounds (i.e., large appliances). The same requirements applied to non-exempt substitutes and blends (generally hydrofluorocarbons or HFC) from January 1, 2019 through April 10, 2020.

The venting prohibition, requirement for certified technicians to work on refrigerant systems, requirement for certified recovery/recycling equipment to be used to meet specified evacuation levels, and disposal requirements continue to apply to all Class I, Class II, and non-exempt substitute refrigerants.

Some of the leak repair requirements that were expanded/added in 2016 include:

- Initial Verification Test (IVT) and Follow-up Verification Test (FVT) now required for all appliance types
- Leak Inspections, including inspection of all visible/accessible parts by a certified technician, required following all leaks over the U.S. EPA trigger rate(s)
- Chronic Leaker Reports required annually by March 1 for appliances leaking over 125% of full charge during the previous calendar year

Functionality

CoolTracker 365 manages recordkeeping and calculations related to all aspects of compliance with Subpart F including:

- A complete inventory of all appliances with a full charge ≥ 50 pounds in service, including location, and with a full charge < 50 pounds in service (i.e., small and medium appliances)



- Leak rate calculations whenever refrigerant is added to a large appliance
- Repair documentation
- Leak inspection deadlines and tracking
- Chronic leaker tracking
- Certification information for technicians and recovery equipment
- Disposal documentation
- Off-site refrigerant transfer documentation
- Automatic Leak Detection System (ALDS) calibration and alarm tracking
- Retrofit and retirement tracking

While the leak repair requirements for non-exempt substitutes no longer apply to large appliances, some of the leak repair requirements are considered best management practices for those units. CoolTracker 365 allows users to decide whether to treat large appliances with non-exempt substitutes (e.g., HFC) one of the following three ways:

1. Exactly the same as large ozone depleting substance (e.g., CFC and HCFC) appliances;
2. Maintain some of the leak repair practices (i.e., 30-day repair window, IVT, FVT), or
3. Treat those appliances like medium and small appliances (no requirements beyond the venting prohibition, use of certified technicians, and use of certified recovery/recycling equipment).

If a future administration reverses or reinstates the leak repair regulations for non-exempt substitutes, updating the method of calculation in the tool simply involves selecting a different drop-down option.

The tool does not allow users to directly enter data from their personal devices since it is spreadsheet-based. Similar tracking tools with that type of functionality generally require ongoing service costs

and updates. Since CoolTracker 365 is based on the Excel application, access from a central server is required.

Reporting

Chronic Leaker Reports

CoolTracker 365 has a built-in tracker for determining which large appliances are required to be reported by March 1 of each year. Determining which units are approaching the reporting level is as simple as opening the chronic leaker tab within the tool. Sorting the sheet and entering response information is simple and the sheet can be saved in Adobe Acrobat® format and submitted in email to the U.S. EPA, if required.

Leak Repair Extensions

While the tool will not automatically prepare reports for submittal, reminders are included on the leak tracking sheet to let personnel entering the data know when an extension may need to be submitted to the U.S. EPA.

Licensing

Trinity's CoolTracker 365 can be licensed to an individual site or to a corporate entity. Implementation of the tool can be completed on an individual site basis or can include multiple locations. Once the tool is implemented, user designations can be made by the client. In addition, the client can also grant access to contractor technicians, as applicable to their internal policies.

Example Implementations

Refineries and Chemical Plants

The number and type of refrigerant-containing equipment at refineries and chemical plants varies widely based on size, location, and type of processes employed, but typically involves both industrial process refrigeration and comfort cooling appliances. Trinity has extensive experience assisting refineries and chemical plants in all facets of refrigerant compliance, including Tool implementation.

Universities

The majority of refrigerant-containing equipment at universities consists of comfort cooling appliances. Before the 2016 rule changes, those appliances were subject to minimal repair requirements. Following the changes, IVT, FVT, leak inspections, chronic leaker reporting, and recordkeeping for these appliances are now required. Trinity has assisted multiple universities in developing procedures, auditing their programs, and implementing the CoolTracker 365 to track refrigerant compliance.

General Manufacturing

From bakeries to automobile manufacturing to breweries, manufacturing facilities have refrigerants in varying amounts. Trinity has assisted many manufacturing facilities to document their refrigerant appliances and repair efforts and to coordinate their management activities in CoolTracker 365.

Grocery and Retail Stores/Warehouses

The types of refrigerant-containing equipment at grocery and retail stores or warehouses typically include commercial refrigeration and comfort cooling appliances. CoolTracker 365 can be implemented for a single site or at multiple sites to allow for regional or corporate-level oversight.

Consulting Services

As part of CoolTracker 365 implementation, Trinity will assist with addition of appliances, technician certifications, disposal records, and the required large appliance leak repairs from previous years (three years in the rule or five years for Title V facilities). Trinity's in-house refrigerant management subject matter experts oversee all tool implementations to ensure proper execution and to identify any gaps in the records.

Trinity also offers other refrigerant-related services, including gap analysis audits, custom courses and training, procedure and policy development, and reporting (e.g., chronic leaker, retrofit/retirement plans).

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

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CONTACT OUR TEAM!

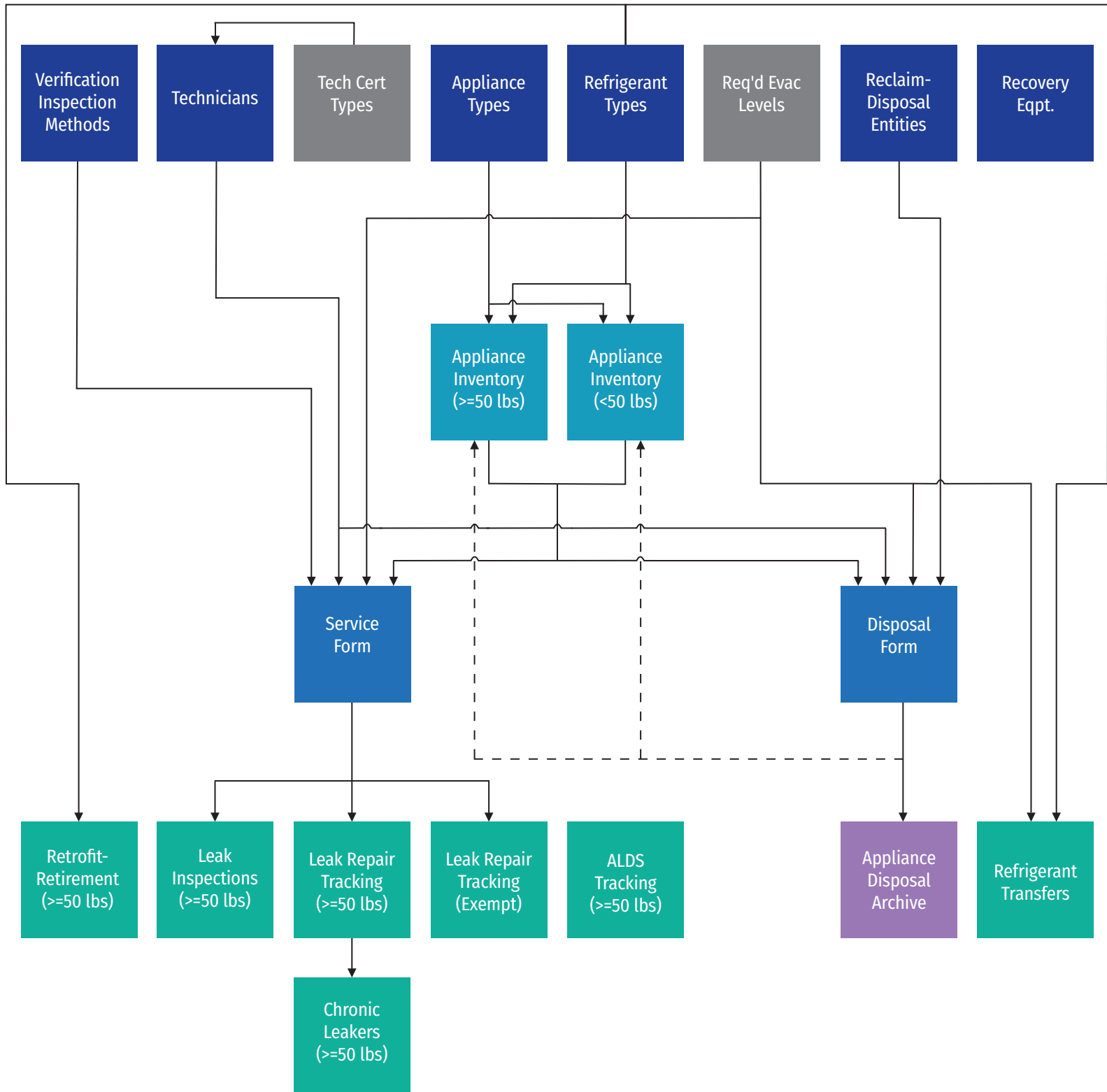
For more information about how we can help your organization, please contact us.

Trinity Dallas Office
P 800.229.6655

SCAN THE QR CODE TO LEARN MORE



COOLTRACKER 365 DATA FLOW



KEY	
	- Reference information <i>(entered)</i>
	- Reference information <i>(pre-defined)</i>
	- Appliance inventories
	- Forms
	- Compliance documentation
	- Archive data

DECISION GUIDE FOR LEAKING REFRIGERATION SYSTEMS

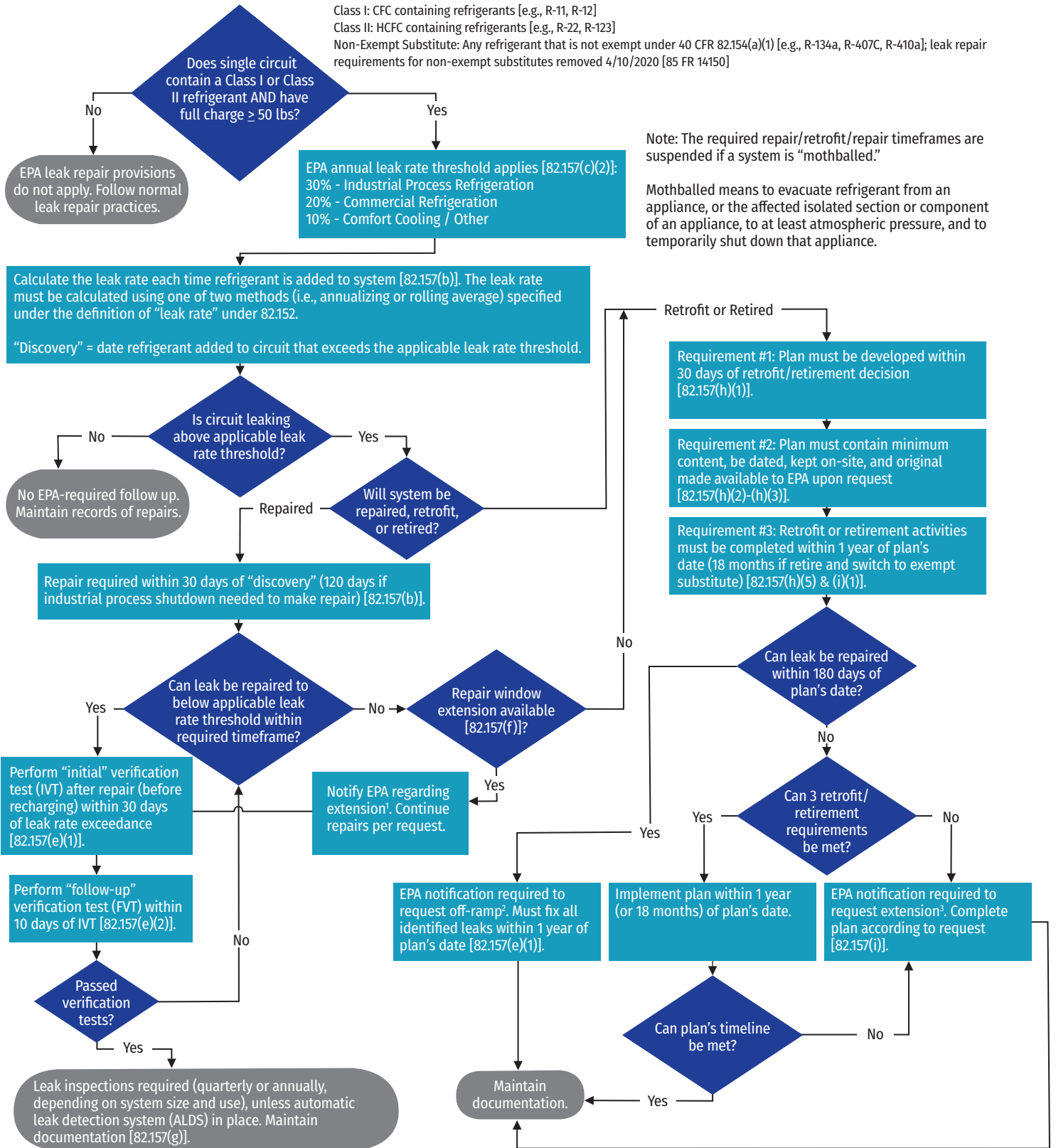
Class I: CFC containing refrigerants [e.g., R-11, R-12]

Class II: HCFC containing refrigerants [e.g., R-22, R-123]

Non-Exempt Substitute: Any refrigerant that is not exempt under 40 CFR 82.154(a)(1) [e.g., R-134a, R-407C, R-410a]; leak repair requirements for non-exempt substitutes removed 4/10/2020 [85 FR 14150]

Note: The required repair/retrofit/repair timeframes are suspended if a system is "mothballed."

Mothballed means to evacuate refrigerant from an appliance, or the affected isolated section or component of an appliance, to at least atmospheric pressure, and to temporarily shut down that appliance.



¹Notify the Environmental Department on systems that cannot be repaired within the required timeframes. Extension requests, if applicable, must be submitted to EPA within 30 days of discovering leaks above the applicable leak rate threshold. Refer to 82.157(f)(4) for details regarding repair window extension requests.

²Retrofit/retirement plan off-ramp requests considered approved unless EPA disapproves within 60 days of receipt of request. Refer to 82.157(h)(5)(ii) for details regarding retrofit/retirement plan off-ramp requests.

³Retrofit/retirement plan extension requests considered approved unless EPA disapproves within 60 days of receipt of request. Refer to 82.157(i) for details regarding retrofit/retirement plan extension requests.