CHEMICAL COMPLIANCE

CoolTracker365™ 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 CoolTracker365™ Tool is a Microsoft® Excel®-based tool designed to track compliance with 40 CFR Part 82, Subpart F (Subpart F) and 40 CFR 84, Subpart C (Subpart C) for stationary refrigeration appliances containing ozone depleting substances (ODS) and substitutes for ODS. While CoolTracker365 is geared toward compliance with the leak repair requirements of 40 CFR 82.157 and 40 CFR 84.106, 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). Similarly, the Subpart C leak repair requirements apply to all appliances (i.e., independent circuits) containing a hydrofluorocarbon (HFC) refrigerant or a substitute with global warming potential (GWP) > 53 with a full charge of ≥ 15 pounds (i.e., regulated appliances) starting January 1, 2026.

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, which includes HFCs and substitutes.

Some of the leak repair requirements that were expanded/added in 2016 and reflected in the Subpart C requirements starting January 1, 2026 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

CoolTracker365 manages recordkeeping and calculations related to all aspects of compliance with Subpart F and Subpart C including:

- A complete inventory of all ODS appliances with a full charge 50 pounds and HFC and listed substitute appliances with a full charge ≥ 15 pounds, including location and full charge information
- A separate, streamlined inventory for appliances with a full charge less than those thresholds (i.e., small and medium appliances)
- Leak rate calculations whenever refrigerant is added to a regulated appliance
- Repair documentation
- Leak inspection deadlines and tracking
- Chronic leaker tracking
- Certification information for technicians and recovery equipment
- Disposal documentation
- Refrigerant purchase documentation
- Off-site refrigerant transfer documentation
- Automatic Leak Detection System (ALDS) calibration and alarm tracking
- Retrofit and retirement tracking
- General maintenance tracking (e.g., oil and filter changes, repairs not related to refrigerant leaks)

Reporting

Chronic Leaker Reports

CoolTracker365 has a built-in tracker for determining which regulated 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 and filtering the applicable column. All information required to be submitted to EPA via the the Central Data Exchange (CDX) can be pulled directly from the tabs within the tool.

Capacity-Leak-Recovery Report

While not required by rule, sustainability reporting for refrigerants may be required by internal corporate resources. CoolTracker365's Capacity-Leak-Recovery Report summarizes current installed refrigerant inventory based on appliances included in the tool and the amount leaked and recovered for a selected calendar year. Inventories and greenhouse gas (GHG) emissions from leaks and recovery of refrigerants are reported in both pounds and carbon dioxide equivalents (CO_2e). GWPs can be defined using several IPCC designations (AR-4, -5, and -6) and combinations of IPCC and EPA-designated GWPs. Additionally, GWPs can be designated by the user, if needed.

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 CoolTracker365 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. Filtering is possible within the tool for single or multiple locations for ease of data review. 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 based on 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 CoolTracker365 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 CoolTracker365 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 CoolTracker365.

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. CoolTracker365 can be implemented for a single site or at multiple sites to allow for regional or corporate-level oversight.

Consulting Services

As part of CoolTracker365 implementation, Trinity will assist with addition of appliances, technician certifications, disposal records, and the required regulated appliance leak repairs from previous years (three years in the rule or five years for Title V/Part 70 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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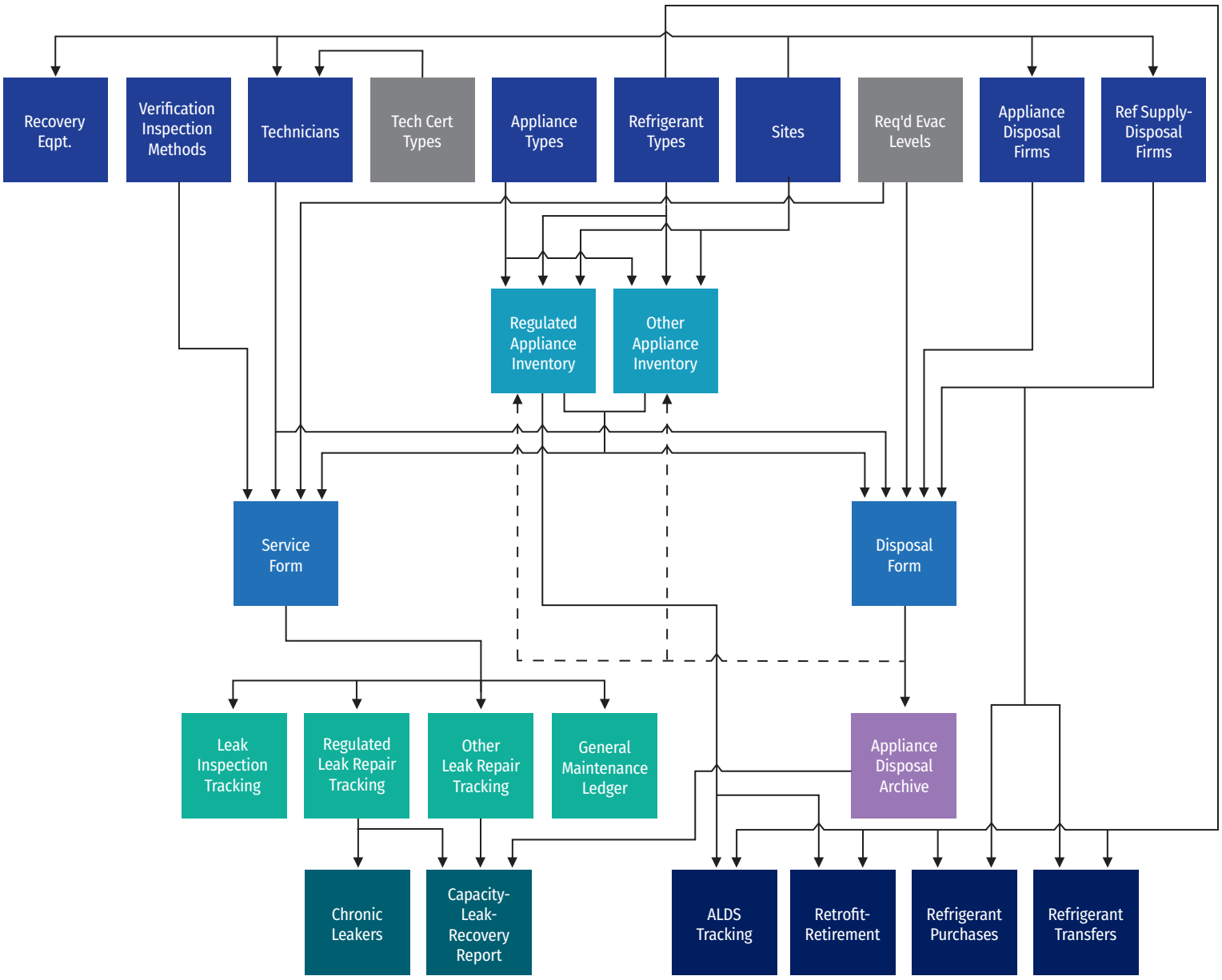
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For more information about how we can help your organization, please contact us.

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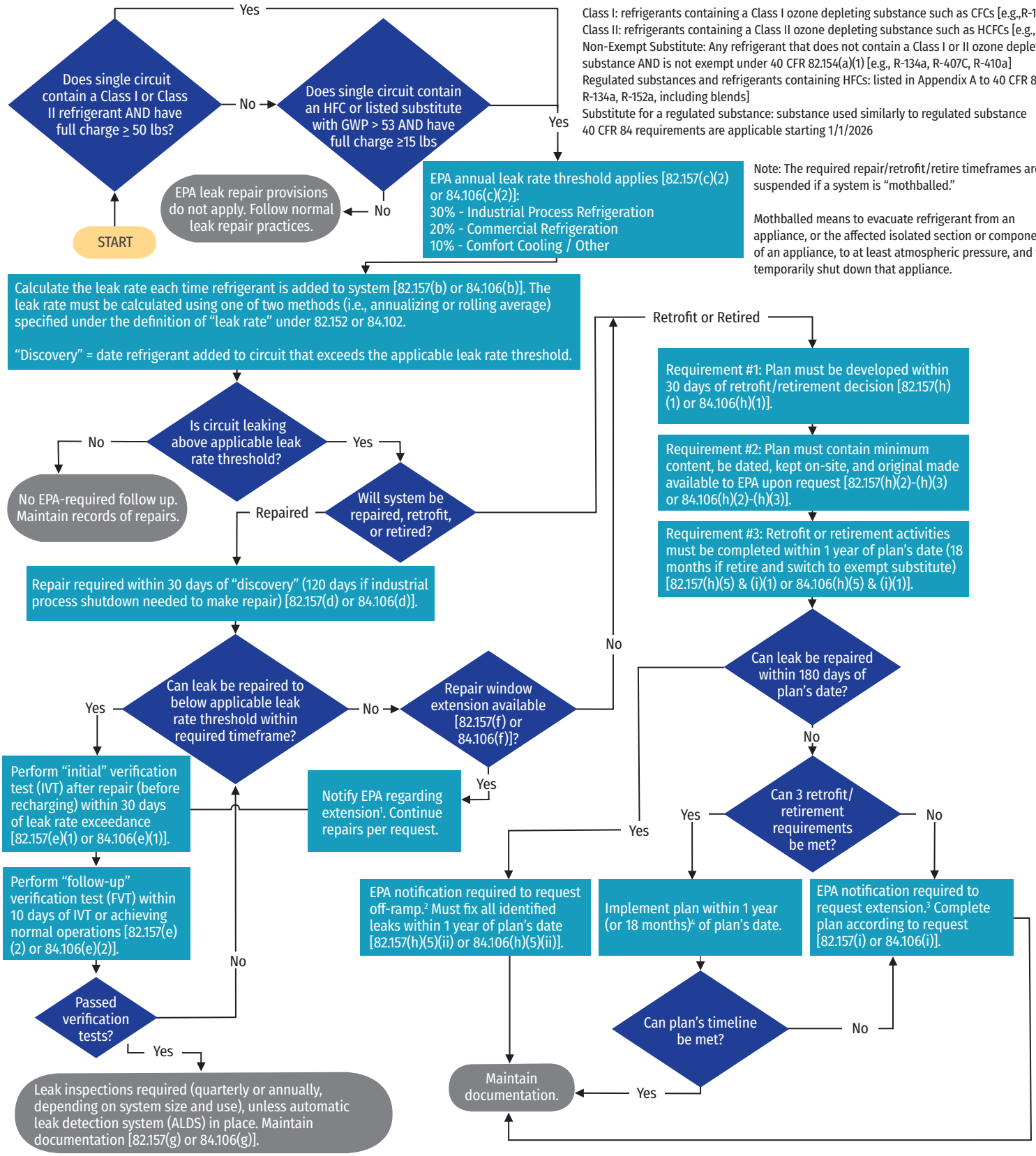
SCAN THE QR CODE TO LEARN MORE

CoolTracker365™ Data Flow



KEY
- Reference information *(entered)*
- Reference information *(pre-defined)*
- Appliance inventories
- Forms
- Reporting data
- Primary service/refrigerant tracking
- Disposal archive data
- Secondary service/refrigerant tracking

Decision Guide for Leaking Refrigeration Systems



Class I: refrigerants containing a Class I ozone depleting substance such as CFCs [e.g.,R-11, R-12]
Class II: refrigerants containing a Class II ozone depleting substance such as HCFCs [e.g.,R-22, R-123]
Non-Exempt Substitute: Any refrigerant that does not contain a Class I or II ozone depleting substance AND is not exempt under 40 CFR 82.154(a)(1) [e.g., R-134a, R-407C, R-410a]
Regulated substances and refrigerants containing HFCs: listed in Appendix A to 40 CFR 84 [e.g. R-134a, R-152a, including blends]
Substitute for a regulated substance: substance used similarly to regulated substance 40 CFR 84 requirements are applicable starting 1/1/2026

Note: The required repair/retrofit/retire 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.

[1]Notify the Environmental Department of 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) or 86.106 (f)(4) for details regarding repair window extension requests.
[2]Retrofit/retirement plan off-ramp requests considered approved unless EPA disapproves within 60 days of receipt of request. Refer to 82.157(h)(5)(ii) or 84.106(h)(5)(ii) for details regarding retrofit/retirement plan off-ramp requests.
[3]Retrofit/retirement plan extension requests considered approved unless EPA disapproves within 60 days of receipt of request. Refer to 82.157(i) or 84.106(i) for details regarding retrofit/retirement plan extension requests.
[4]Only Allowed 18 months for retrofit of ODS to exempt substitute under 82.154(a).

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