

the NEWS

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Keeping Refrigerant Recovery Records

By James J. Sweetman
For *The NEWS*

Most contractors understand the need for refrigerant recovery and the importance of integrating a reclaim program into their company's day-to-day operations. However, many contractors have overlooked the aspect of record keeping and still have no definitive procedures in place to accurately collect and record reclaim data. Insufficient records maintenance can make data retrieval very difficult and a detailed Environmental Protection Agency (EPA) compliance report near impossible. As a result, potential issues could arise.

As many contractors know, most building owners are unaware of, or have limited knowledge about, their legal responsibilities under EPA regulations. Many building owners expect or believe that their contractor keeps them in compliance. Essentially, they depend on your expertise. Can your company keep your customers compliant? If so, you have differentiated yourself. But if you are like most contractors, the odds of EPA-related issues reaching your doorstep are much more likely.

THE ISSUES

Refrigerant management is re-emerging as a highly politicized issue due in part to expanding global climate change legislation. New EPA regulations insist that facilities monitor and track recovery rates and have in place a refrigerant recovery plan. As the federal government conducts audits to ensure that facilities comply with refrigerant recovery requirements, failure to provide complete information on time will result in steep penalties. When this happens, building owners will inevitably turn to contractors for the required documentation.

In light of these looming issues, contrac-

Serial No of Cylinder	Refrigerant Type	Quantity in lbs	Notes	Removal Date	Credit Due \$
026586	R-410A	24.1		01/24/2010	
053219	R-22	21.3		01/24/2010	
123949	R-407C	36.6		01/24/2010	
062177	R-22	33.9		01/24/2010	
072125	R-22	26.5		01/24/2010	
106690	mixed	11.7	R22(86.3%) R404A(13.7%)	01/24/2010	
076773	R-22	34.4		01/24/2010	
077179	R-402B	16.9		01/24/2010	
069277	R-22	22.8		01/24/2010	
071509	R-409A	6.9		01/24/2010	
060168	R-22	17.5		01/24/2010	

Contractors concerned about record keeping might want to consider cylinder management reclaim programs that offer centralized EPA record keeping. (Photo courtesy of Dobilas Advisors LLC.)

tors should consider the following:

- Do my customers believe we maintain their refrigerant related records?
- Are we able to produce their records in the event of an EPA audit and with the correct level of detail?
- Is my company likely to be investigated or audited by the EPA if my customers fail to comply and how would we measure up?
- Are we able to provide cradle-to-grave tracking of all recovered refrigerant?

THE CONUNDRUM

Truth be told, most contractors surveyed state they maintain insufficient data or no data at all; a crushing reality when proper reclaim records management is an essential component for compliance as well as your obligation to your customer. When confronted with a federal audit, insufficient record keeping can prove to be very costly; additionally, it can lead to some tough issues for building owners and contractors alike.

The fact is that collecting, logging, and retrieving refrigerant reclaim data can be a

complicated, costly, and ineffective process. Large contractors with many technicians are faced with numerous cylinder swap-out locations, which, inevitably results in a multitude of documents from numerous sources. Complications often arise because there is no centralized data retrieval platform.

Alternately, in-house consolidation can help to centralize the record keeping process but presents its own obstacles. Documenting each cylinder prior to consolidation can be a very time consuming and unorganized process. Also, this type of manual paper-based record keeping is prone to errors. Refrigerant management software is good but still involves dual entry, multiple employees, and is very costly to set up. Ultimately, understanding the complexity of reclaim records maintenance can be a challenging endeavor for any contractor.

Aside from the obvious regulatory implications, contractors should consider the marketing advantages a detailed reclaim management platform could have. Contractors that can provide comprehensive record

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keeping as part of their overall responsible refrigerant handling policy will show that they are a cut above the rest. Since many facility owners already have this expectation, the value added service can provide piece of mind for both.

GAIN CONTROL AND STAY COMPLIANT

Contractors concerned with the record keeping issue might want to consider a cylinder management reclaim program that offers centralized EPA record keeping as part of its core service. The provider of such ser-

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vices handles all aspects of the reclaim and cylinder management process — onsite pick-up, cylinder maintenance, logging, consolidation, and record keeping. The company maintains detailed up-to-date reclaim data on one central platform accessible through a secure Web portal. All records are organized and available on demand in the form of EPA compliance reports. ■

FOR MORE INFORMATION...

The author is with Consolidated Refrigerant Solutions. Its Reclaim Data Management System® provides clients access to the company's record keeping platform by going to a Website and logging in. For more information go to www.consolidatedrefrigerantsolutions.com.

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