



Top 10 Questions Every Environmental Air Manager Needs to Consider about R-22 Phaseout



CONSEQUENCES

- U.S. EPA fines are as much as \$37,500 per day, per violation
- EPA settlements may include Supplemental Environmental Projects
- Title V Air Permits can be revoked
- Criminal jail sentences for knowing and willful violations of the regulations affect technicians as well as facility owners and managers

Sphera Refrigerant Advisory Service can help assess your compliance with EPA Title V and VI and develop a plan for R-22 phaseout due by 2020.

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1. Is your Title V Air Permit impacted by Title VI refrigerant regulations?
2. How do you handle deviation reporting related to refrigerant leaks and leak repairs?
3. Has your organization prepared and budgeted for the final R-22 phase-out by 2020?
4. Can you quantify your current refrigerant usage and project future needs?
5. Will your operations be affected by the EPA's phase-down of HFC refrigerants with high global warming potential (GWP) starting in 2016?
6. Does your operation have reporting requirements for high GWP refrigerants? Does California ARB-32 Reporting affect your facility?
7. Do you have a designated refrigerant manager or management team for your organization?
8. Have they been provided with current training on regulations, new refrigerants, and industry changes?
9. Are your policies, procedures, and work instructions updated to include the new refrigerants and phase-outs?
10. Is a refrigerant recordkeeping system in place and can your organization produce 3 to 5 years of refrigerant-specific service records, leak rate calculations, leak repairs, conversions, and disposals?