

# NEWS ON R22 USE & BANS

The imminent ban on the use of virgin HCFC refrigerant gases represents a very real business threat to any customers which rely on the use of refrigerants like R22 or R408A in their processes or air conditioning systems. R22 remains one of the most commonly used refrigerants in the UK so many organisations will be affected by the ban. The Ozone Depleting Substances Regulations which introduced this ban was recently revised at an EU level, and proposed changes come into effect 1<sup>st</sup> January 2010. Find out more below...

## I. CONTINUED USE OF HCFCs

The phase out dates remain unchanged:

- from 1st January 2010 it is illegal to use virgin HCFCs to service RAC equipment. This ban applies even if HCFC was purchased before the ban date. It is illegal to stockpile and use any supplies of virgin HCFCs after the end of 2009.
- from 1st January 2015 it will be illegal to use recycled or reclaimed HCFCs to service RAC equipment.

Note: these bans refer to the "use" of HCFCs for servicing and maintenance. Customers can continue using RAC equipment containing HCFCs beyond the phase out dates provided that no additions of refrigerant are required.

Any company anticipating using reclaimed HCFCs to maintain systems after the end of 2009 should contact their refrigeration supplier to discuss how to meet the anticipated demand. Due to the impending deadline on the use of virgin HCFCs, suppliers are likely to run-down their stocks of virgin gases before the actual deadline, so stocks may become limited before the end of December 2009.

## 2. RECLAIMED OR RECYCLED?

The new legislation includes an important distinction between "recycled" and "reclaimed" gases.

**Recycled HCFCs are recovered HCFC that has been subject only to a basic cleaning process (this might include mechanical filtering and moisture removal).** Recycled HCFCs may only be used by either the undertaking which carried out the recovery (in most cases the refrigeration contractor) or the undertaking for which the recovery was carried out (the owner). Recycled HCFCs may not be placed on the market – "placing on the market" means the supplying or making available to third persons within the Community for payment or free of charge. For example, the owner could use the recycled HCFC in RAC equipment at other sites they operate from but they cannot sell recycled HCFC to a third party.

**Reclaimed HCFCs are recovered HCFC gas that has been chemically reprocessed to a specified standard.**

Reclaimed HCFCs may be placed on the wider market and used by undertakings other than the original contractor and owner. Reclaimed HCFCs must be held in containers labelled as such, with information on the batch number and name and address of the reclamation facility. Reclaimed material has been reprocessed to a specified quality that is suitable for use in a refrigeration system whereas recycled material is of an unknown quality – it might contain contaminants that could impair the performance of a refrigeration plant.

### Labelling of equipment using recycled or reclaimed HCFC

Where recycled or reclaimed HCFCs are used, the RAC equipment must be labelled to show:

- The quantity and type of recycled/reclaimed HCFC added in the system, and
- Other label elements set out in Annex I to Regulation EC/1272/2008

## 3. SUMMARY OF OTHER NEW REQUIREMENTS

### i. Leak testing and rectification

These new operator (or equipment end user) obligations are broadly similar to those of the EC F gas Regulation:

- to prevent and minimise any leakages and emissions of controlled substances.
- to carry out the new leak testing requirements as in the table below:

#### NEW HCFC LEAK TESTING OBLIGATIONS

Undertakings operating RAC systems with an HCFC charge of:

- 3 kg or more must be checked for leakage at least once every 12 months; (this does not apply to equipment with hermetically sealed systems, which are labelled as such and contain less than 6 kg of HCFC)
- 30 kg or more must be checked for leakage at least once every six months;
- 300 kg or more must be checked for leakage at least once every three months

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## ii. Storage for recycling or reclamation

Before you recover HCFC refrigerant for recycling or reclamation you should consider the following points if the owner intends to store the materials on site:

- The holder should ensure that cylinders used to store recovered/recycled HCFCs remain within their statutory pressure test validation period.
- Recovered HCFCs pending recycling or reclamation are hazardous waste subject to the Hazardous Waste Regulations. Facilities storing recovered HCFCs must register with the Environment Agency as an exempt waste operation. Storage of recycled or reclaimed HCFCs does not require a permit.

## iii. System record keeping

- Users of equipment containing over 3 kg of HCFC refrigerant must keep a record of the quantity and type of any gases removed or added, and of the company or technician carrying out the service or maintenance.
- Undertakings using recycled or reclaimed HCFCs for service or maintenance must keep records of the undertakings which supplied the reclaimed gases and the sources of recycled gases.

## 4. WHERE TO GET MORE INFORMATION

Further advice on HCFC phase out strategies, solutions and decision criteria are available in the full information sheet “RAC 8—R22 Phase out” available from F Gas support. Additional leaflets on all aspects of the F Gas (HFC) and ODS (HCFC) Regulations are available at [www.defra.gov.uk/fgas](http://www.defra.gov.uk/fgas) :

RAC 1 – Overview

RAC 2 – Usage of F gases and ODS

RAC 3 – Key Obligations

RAC 4 – Getting Started

RAC 5 – Certification of personnel and companies

RAC 6 – Practical Guidance including details of labelling requirements

RAC 7 – Refrigerant Selection covering alternative refrigerants

RAC 8 - R22 Phase Out

Sample log sheet: in PDF or word format

F Gas Support is a UK Government free helpline to deal with individual queries about the F Gas Regulations and to provide a central resource for information, particularly for end users but also for anyone else affected by the F Gas or ODS Regulations. The following contact points are now in operation:

Telephone Helpline: 0161 874 3663

Email: [fgas-support@enviros.com](mailto:fgas-support@enviros.com)

Website: [www.defra.gov.uk/fgas](http://www.defra.gov.uk/fgas)