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capital report

EPA Reminds Auto Care Industry of Refrigerant Sales Restrictions

On July 23, the U.S. Environmental Protection Agency (EPA) issued a letter addressed to the Auto Care Association to remind the industry of new rules extending sales restrictions for ozone-depleting refrigerants to include approved non-ozone depleting substitutes, primarily R-134a and HFO-1234yf. Under the rules, which went into effect on Jan. 1, 2018, refrigerant vendors must verify that the purchaser of a substitute refrigerant, supplied in a two-pound container or larger, is either a certified technician or a shop that employs at least one certified technician.

The letter states that, "While the sales restriction is new as it relates to the sale of substitute refrigerant, there is a long-standing requirement under Section 609 that technicians must be certified to service motor vehicle air conditioners (MVACs) for consideration (e.g., payment or bartering) regardless of the refrigerant used."

The EPA letter further reminds refrigerant vendors that for all containers two pounds and over, they must maintain invoices that indicate the name of the purchaser, date of sale and quality of refrigerant purchased. Further, if somebody other than the certified technician purchases the refrigerant, the seller must maintain documentation provided by the buyer demonstrating that the buyer employs at least one certified technician.

According to the letter, "Selling refrigerant to someone who is not a certified technician or the

technician's employer could result in enforcement action against the refrigerant vendor."

It should be noted that these restrictions do not apply to sales to do-it-yourselfers of refrigerant in under two-pound containers. However, any small cans produced after Jan. 1, 2018 must be equipped with a self-sealing valve that meets EPA requirements.

Questions? Contact [Aaron Lowe](#).

[**Read EPA's Letter**](#)