

Refrigeration and Air-Conditioning Appliances

*Does not include Motor Vehicle Air Conditioners. See guidance under **Vehicles**.*

Definition/Description

Appliance means any device which contains and uses a refrigerant and which is used for household or commercial purposes, including any air conditioner, refrigerator, chiller, or freezer.

Small Appliance means any appliance that is fully manufactured, charged, and hermetically sealed in a factory with five (5) pounds or less of a class I or class II substance used as a refrigerant, including, but not limited to, refrigerators and freezers (designed for home, commercial, or consumer use), medical or industrial research refrigeration equipment, room air conditioners (including window air conditioners and packaged terminal air heat pumps), dehumidifiers, under-the-counter ice makers, vending machines, and drinking water coolers.

High-Pressure Appliance, for the purposes of this guidance, is any appliance which does not meet the definition of a "Small Appliance" as described above. High-pressure appliances are subject to the same guidance as small appliances, *except* that some high-pressure appliances must be disassembled prior to movement, regardless of condition, and will require the generator to recover the refrigerant prior to disassembly. Generators and DLA Sites should not automatically classify high-pressure appliances as scrap just because they have been disassembled, but rather based upon actual condition.

Policy References/Authority

The Clean Air Act Amendment of 1990, Section 608.c, prohibits intentional venting or releasing of ozone depleting refrigerants or their blends or substitute refrigerants to the environment. All refrigerants must be recovered and accounted for, prior to *any* appliances being processed as scrap or buried in a landfill. Violations of the Clean Air Act (CAA) and of USEPA regulations carry civil or criminal penalties and fines.

USEPA Regulations at 40 CFR 82.156(f), "Effective July 13, 1993, persons who take the final step in the disposal process (including but not limited to scrap recyclers and landfill operators) of a small appliance, room air conditioning, MVACs, or MVAC-like appliances must **either**:

- (1) Recover any remaining refrigerant from the appliance in accordance with this section, as applicable; **OR**
- (2) Verify that the refrigerant has been evacuated from the appliance or shipment of appliances previously. Such verification must include:

- A signed statement ***from the person from whom the appliance or shipment of appliances is obtained***" (the generator) "that all refrigerant that had not leaked previously has been recovered from the appliance or shipment of appliances...***and***,

- This statement must include the name and address* of the person who recovered the refrigerant and the date the refrigerant was recovered...”

* DLA Disposition Service has confirmed with the USEPA that the address must consist of the following information: **Street Address, City, State, and Zip Code**

DOD 4160.21-M: It is DOD policy that all DOD activities will comply with the CAA and all USEPA regulations. Disposal procedures for all DOD activities are prescribed at **DOD 4160.21-M, Chapter 10, Attachment 1, Item 24**

NOTE: USEPA REGULATIONS DO NOT APPLY OVERSEAS. Host nation environmental laws and regulations may regulate this type of property; therefore, DLA Disposition Service Sites overseas may have different or special turn-in requirements to comply with the DOD Executive Agent Final Governing Standards (FGS) and host nation laws and regulations applicable overseas.

Receiving Process

Refrigerant Recovery Guidelines for Turn-In to DLA Disposition Service Sites:

- **Serviceable appliances (cc: A-D) should** be turned in with the refrigerant intact whenever possible to preserve R/T/D/S potential.
- **Unserviceable appliances with any R/T/D/S potential (cc: E-H) should** be turned in with the refrigerant intact, as long as they have not been disassembled and all parts are intact. (Do NOT include items which have been crushed, dismantled, disfigured, etc. and are truly scrap).
- **Scrap and/or Disassembled items must** have the refrigerant recovered prior to turn-in to the DLA Disposition Service Site (includes off-site generator storage locations)

Documentation of Refrigerant Status:

For items which still contain refrigerants:

- **Per DOD 4160.21-M, Chapter 10, attachment 1, par. 24.c.(3):** “Generating activities shall attach the following statement to the turn-in document (DDForm1348-1-A) and to the property identifying the class I or II refrigerant contained in the item:

WARNING: Contains (insert name of substance), a substance which harms public health and environment by destroying ozone in the upper atmosphere.”

- **OR, as an alternate statement, which DLA Disposition Service will accept,** the generator may include a statement on the ETID/DTID, such as:

“Contains Refrigerant”, “Refrigerant Intact”, or something similar, to alert any subsequent owner, scrap processor, or landfill operator.

Items which no longer contain refrigerants require all of the following at the time of receipt:

The ETID/DTID must contain a statement clearly indicating that the items do not contain refrigerants.

- Variations of the statement are authorized as long as the intent is clear, e.g., “EMPTY” or “Refrigerants Recovered”, “Refrigerants Removed”, etc.
2. The ETID/DTID must be accompanied by documentation provided by the generator, attesting that all refrigerants which had not leaked previously were recovered in accordance with USEPA regulations, and includes the information required at 40 CFR 82.156(f).
 - Generators should be encouraged to use DLA DISP SVCS Form 2016 (see example of a completed form at the end of this guidance) which lists all of the EPA requirements; however, generator forms are acceptable as long as the correct information and signatures are obtained.
 3. Labels, Tags, Stencils, or Markings indicating that items no longer contain refrigerants.
 - Variations of the statement are authorized as long as the intent is clear, e.g., “EMPTY” or “Refrigerants Recovered”, “Refrigerants Removed”, etc.

Other Considerations:

The refrigerant is gone and the generator does not know what happened to it:

1. Section 82.156(f) requires a signed statement be obtained from the supplier of the appliances stating “*all refrigerant that had not leaked previously has been recovered*” in accordance with the regulations. If the entire refrigerant has leaked out, the signed statement need not contain the name and address of the person who performed the recovery, as no such person exists. The signed statement must, however, clearly state that the entire refrigerant in the appliance had already leaked out.

Items which have had components removed, i.e., *Compressors*:

1. If a Site receives an appliance in which some of the components of the refrigerant system have been removed (i.e., the compressor), EPA believes that these types of appliances are *still* subject to the safe disposal regulations. Therefore, an appliance with portions of the refrigerant system remaining is subject to the safe disposal regulations, *as well as the components that were removed*.
2. **In other words, if a generator removes the refrigerant from an item, *and removes the compressor for turn-in by itself*, **BOTH THE ITEM AND THE COMPRESSOR WILL REQUIRE A REFRIGERANT REMOVAL CERTIFICATION TO ACCOMPANY THE DTID(s), and BOTH WILL REQUIRE AN “EMPTY” LABEL AFFIXED!****
3. If a Site receives an appliance in which the entire refrigerant system has been removed, EPA believes that these appliances are not subject to the safe disposal regulations. They are no longer appliances that contain or use a refrigerant. However, if the Site is not certain that the

entire refrigerant system has been removed or has no basis to believe that the appliance is an empty shell, then the Site should obtain a verification statement.

Warehousing/Storage

Handle/Store for Clean Air Act Compliance - Do not illegally vent refrigerant from a refrigeration item or appliance to the environment.

Handle and store both usable and scrap, in a manner that does not damage or rupture refrigerant lines, conduits, pipes or compressors.

Distinguish storage areas between scrap and non-scrap items.

When stored outside, store refrigerators and freezers, **except for those with magnetic or self-closing latching devices**, in a manner that precludes any possibility of humans becoming trapped inside such units. Use non-destructive measures that do not impair the reutilization or sale potential of the units.

Air Circulation: Units stored inside should be stored to permit air circulation inside the units to prevent odors and mildew, e.g., placing a small wedge between the door and the box.

Power cords: In CONUS receive only refrigerators and freezers that have 3-wire grounded cords and plugs. Any 2-wire cords and plugs must be removed before acceptance. In overseas areas, upon receipt, refrigerators and freezers will have grounded plugs, regardless of the number of wires in the power cords.

Reutilization/Transfers/Donations (R/T/D)

In most cases, all appliances are eligible for R/T/D, regardless of refrigerant status. No special documentation concerning the status of refrigerants is required to be passed to the R/T/D recipient, unless the Customer specifically requests it.

Demilitarization/Mutilation

Neither are required unless designated by assigned DEMIL or other code/guidance. If so, actions will be taken according to the code and in compliance with above regulatory requirements. DEMIL actions will be performed by the DLA Disposition Service Centralized DEMIL Centers.

Sales

Serviceable and Unserviceable Appliances (“Non-Scrap”). DLA Disposition Service currently sells all non-Scrap appliances which fail R/T/D efforts. Since this process is NOT the final step in the disposal process, ***the refrigerants do not have to be removed by the DOD generators prior to receipt*** at the DLA Disposition Service Site, ***nor prior to sale to GL or any other purchaser***.

Scrap Appliances. DLA Disposition Service Site currently sells scrap appliances on a Long-Term Sale to Liquidity Service, Inc. Under the terms of that contract, DLA Disposition Service Sites must ensure that the refrigerant is recovered prior to delivery.

Documentation attesting to the presence or absence of refrigerants: Copies of the original DTIDs must be provided to both GL and Liquidity Service upon delivery of any refrigeration or air-conditioning appliances. Copies of the “Refrigerant Removal Verification Form” must also be provided, when applicable.

Ultimate Disposal In the unlikely event that an appliance requires ultimate disposal through a Hazardous Waste disposal contract, the disposal contractor will be required to process and dispose of all appliances in accordance with Federal law and applicable contract terms, including the proper removal and disposition of refrigerants.

Property Accounting Will be accomplished in accordance with receipt information and current EDOC procedures. If EDOC is not available, hard copies of all documentation should be kept on file until they can be entered into EDOC. **Remember:**

ETID/DTIDs must be annotated with the refrigerant status, e.g., “Contains Refrigerants”, “Refrigerants Recovered”, “EMPTY”, etc.

Refrigerant Removal Documentation must be received and filed for items which no longer contain refrigerants. Removal documentation MUST include the applicable ETID/DTID numbers for cross-reference.

Attachments:

1. Sample of a correctly completed “Refrigerant Removal Verification Statement” Form
2. Blank “Refrigerant Removal Verification Form”
3. “Quick-Reference” Chart

Attachment 1
SAMPLE OF A CORRECTLY COMPLETED VERIFICATION FORM

REFRIGERANT REMOVAL VERIFICATION STATEMENT (Prescribing Authority: 40 CFR 82.156(f)(2)* & DOD 4160.21-M)							
THE REFRIGERANT HAS BEEN REMOVED FROM THE ITEM(S) LISTED BELOW, IN COMPLIANCE WITH THE CLEAN AIR ACT AMENDMENTS OF 1990, SECTION 608, AND U.S. EPA REGULATIONS AT 40 CFR 82.156							
Technician Who Removed Refrigerant	Street Address	City	ST	Zip Code	Date Removed	Item Description	Item Qty
Sgt. Snuffy McDonald	123 Tank Rd. (HVAC Maint Shop,)	Fort Polk	LA	12345	6/12/2010	Refrigerators	6
Jack Johnson	123 Tank Rd. (HVAC Maint Shop,)	Fort Polk	LA	12345	6/16/2010	Refrigerators	3
Pvt. David Jones	981 A-St. (1 st Battalion, Field Maint Shop)	Fort Polk	LA	12345	7/03/2010	Refrigerator	1
							-
							-
							-
DTID # <i>only</i>	W12345-0099-XYZ <i>(Enter one only)</i>			Total Items			10
<u>Printed Name of Person Turning-In</u> Appliance(s) Capt. Richard Petty				<u>Signature of Person Turning-In</u> Appliance(s) <i>Capt. Richard Petty</i>			

NOTE: Common item names may be used for "Item Description". Serial numbers or other specific descriptions may be included in the item description, but are not required. As long as the DTID number is permanently marked on each item, a single Form similar to the one above will suffice.

Attachment 2

REFRIGERANT REMOVAL VERIFICATION STATEMENT <i>(Prescribing Authority: 40 CFR 82.156(f)(2)* & DOD 4160.21-M)</i>							
THE REFRIGERANT HAS BEEN REMOVED FROM THE ITEM(S) LISTED BELOW, IN COMPLIANCE WITH THE CLEAN AIR ACT AMENDMENTS OF 1990, SECTION 608, AND U.S. EPA REGULATIONS AT 40 CFR 82.156							
Technician Who Removed Refrigerant	Street Address	City	ST	Zip Code	Date Removed	Item Description	Item Qty
DTID # <i>(Enter one only)</i>				Total Item Qty			
<u>Printed Name of Person Turning-In</u> Appliance(s)				<u>Signature of Person Turning-In</u> Appliance(s)			

NOTE: Common item names may be used for "Item Description". Serial numbers or other specific descriptions may be included in the item description, but are not required. As long as the DTID number is permanently marked on each item, a single Form similar to the one above will suffice.

***VERBATIM FROM 40 CFR 82.156(f)**(Emphasis added by J-33): "(f) Effective July 13, 1993, persons who take the final step in the disposal process (including but not limited to scrap recyclers and landfill operators) of a small appliance, room air conditioning, MVACs, or MVAC-like appliances must either:

- (1) **Recover** any remaining refrigerant from the appliance in accordance with paragraph (g) or (h) of this section, as applicable; **OR**
- (2) **Verify** that the refrigerant has been evacuated from the appliance or shipment of appliances previously.

Such verification must include a signed statement **from the person from whom the appliance or shipment of appliances is obtained** that:

All refrigerant that had not leaked previously has been recovered from the appliance or **shipment of appliances** in accordance with paragraph (g) or (h) of this section, as applicable.

This statement must include:

- o the name and address of *the person who recovered* the refrigerant, and
- o the date the refrigerant was recovered"

Attachment 3- QUICK REFERENCE CHART

Receipt	<ul style="list-style-type: none">• Prior to Turn-In, Generator responsible for Refrigerant recovery from Scrap & Disassembled Items <i>only</i>.• GL takes all non-Scrap items with refrigerants still Intact• Includes receipt at Disposition Services Site & RIP at Generator's Site
DTID Statement	<ul style="list-style-type: none">• Requires refrigerant status statement:<ul style="list-style-type: none">• "Contains Refrigerants", "ODS Intact", etc.• "Empty", "Refrigerants Recovered", etc.
Refrigerant Removal Documents	<ul style="list-style-type: none">• Required if Refrigerant Not Intact<ul style="list-style-type: none">• Use DRMS Form 2016 OR Generator Form with Required Information
Label Requirements	<ul style="list-style-type: none">• No Label Required if Item Contains Refrigerant <i>-OR</i>• "Empty" Label/Tag/Stencil/Marking if No Refrigerant
Storage	<ul style="list-style-type: none">• Store Serviceable & Unserviceable Separate from Scrap• Take precautions to avoid puncturing charged systems
R/T/D	<ul style="list-style-type: none">• Eligible for all R/T/D actions regardless of condition
Sales	<ul style="list-style-type: none">• All except true Scrap go to GL<ul style="list-style-type: none">• Includes those with and without refrigerant• Provide Copies of Documentation to GL
Scrap	<ul style="list-style-type: none">• Items Cannot Contain Refrigerants• Items should be labeled "EMPTY"• Provide Copies of Documentation to Liquidity Services