



Environmental audit checklists are designed to assist businesses by providing a low cost way of reviewing compliance with Minnesota's environmental laws and rules. Because the laws and rules are numerous and often complicated, this checklist cannot be a complete guide to your legal obligations. You may have obligations that are not covered on this checklist. If you have questions regarding the Environmental Audit Program or this checklist, please call the Small Business Environmental Assistance Program (SBEAP) at 651-282-6143 or 800-657-3938.

Date of audit \_\_\_\_\_

Company \_\_\_\_\_

Completed by/Title \_\_\_\_\_

## Environmental Audit Program Participation

A check mark in any of the boxes indicating that a requirement is not being met designates a violation of one or more chlorofluorocarbon regulations (**except box numbers 12 and 20**). To participate in the Environmental Audit Program, submit a report of your findings to the Minnesota Pollution Control Agency (MPCA). The Report Inventory form lists items that need to be included in the report and meets the audit report requirements. You do not need to submit a copy of this checklist.

Answer each question unless specifically directed otherwise.

## Refrigerant Recovery or Recycling Equipment

### 1. Have you registered all of your recover-only or recycling equipment with the U.S. Environmental Protection Agency (EPA)?

☐ Yes You meet this requirement.

☐ No You are not meeting this requirement.

• If you possess refrigerant *Recovery-Only* equipment, **complete Section A.**

• If you possess refrigerant *Recover/Recycle* equipment, **complete Section B.**

### A. Recover-Only Equipment

(If your business *does not* have recover-only equipment, skip this section and go to question 16.)

### 2. If R-12 **recover-only** equipment: is the equipment EPA approved? (i.e. Does the equipment have a label that reads: "Design Certified by [testing company name] to meet Society of Automotive Engineers [SAE] J2209 for use with Chlorofluorocarbons [CFC]-12"?)

☐ Yes Your equipment meets this requirement.

☐ No Your equipment is not meeting this requirement.

### 3. If R-134a **recover-only** equipment: is the equipment EPA approved? (i.e. Does the equipment have a label that reads: "Design Certified by [testing company name] to meet SAE J1732 for use only with HFC-134a"?)

☐ Yes Your equipment meets this requirement.

☐ No Your equipment is not meeting this requirement.

### 4. Is the refrigerant recovered into a Minnesota Department of Transportation or Underwriters Laboratories approved refillable container?

☐ Yes You meet this requirement.

☐ No You are not meeting this requirement.

5. **Is the recovered refrigerant processed using a *Reclaimer* off-site or by using your own *Recycling* equipment?**
- ☐ Reclaimer    Go to next question.
- ☐ Recycling    **Go to question 10.**
- ☐ Neither    Refrigerant must be reclaimed or recycled prior to reuse.
6. **Is the recovered refrigerant sent to an EPA certified reclaimer for processing to Air-Conditioning and Refrigeration Institute (ARI) 700-93 specifications before reuse in mobile air conditioning systems?**
- ☐ Yes    You meet this requirement.
- ☐ No    You are not meeting this requirement.
7. **Does your business have records of where refrigerant is sent (name and address)?**
- ☐ Yes    You meet this requirement.
- ☐ No    You are not meeting this requirement.
8. **Are the records kept a minimum of three years?**
- ☐ Yes    You meet this requirement.
- ☐ No    You are not meeting this requirement.
9. **Are the records on-site?**
- ☐ Yes    You meet this requirement.
- ☐ No    You are not meeting this requirement.
10. **Is the recovered refrigerant recycled by EPA approved equipment?**
- ☐ Yes    You meet this requirement.
- ☐ No    You are not meeting this requirement.
11. **Does your business own this refrigerant recycling equipment?**
- ☐ Yes    You meet this requirement.
- ☐ No    You are not meeting this requirement. Recycling equipment must be owned by the same person who owns the recover-only equipment.
12. **Do you send refrigerant to be recycled off-site?**
- ☐ Yes    Go to next question.
- ☐ No    Go to **Section B** (instruction directly above question 16).
13. **Does your business have records of where refrigerant is sent (name and address)?**
- ☐ Yes    You meet this requirement.
- ☐ No    You are not meeting this requirement.
14. **Are the records kept a minimum of three years?**
- ☐ Yes    You meet this requirement.
- ☐ No    You are not meeting this requirement.
15. **Are the records on-site?**
- ☐ Yes    You meet this requirement.
- ☐ No    You are not meeting this requirement.

## B. Recover/Recycle Equipment

(If your business *does not* have recover/recycle equipment, skip this section and go to question 24.)

**16. If R-12 equipment: is the equipment EPA approved?** (i.e. Does the equipment have a label that reads: "Design Certified by [testing company name] to meet SAE J1991"?)

- ☐ Yes Your equipment meets this requirement.  
☐ No Your equipment is not meeting this requirement.

**17. If R-134a equipment: is the equipment EPA approved?** (i.e. Does the equipment have a label that reads: "Design Certified by [testing company name] to meet SAE J2210"?)

- ☐ Yes Your equipment meets this requirement.  
☐ No Your equipment is not meeting this requirement.

**18. If dual (services both R-12 and R-134a using common circuitry) recover/recycle equipment: is the equipment EPA approved?** (i.e. Does the equipment have a label that reads: "Design certified by [testing company name] to meet SAE J1770"?)

- ☐ Yes Your equipment meets this requirement.  
☐ No Your equipment is not meeting this requirement.

**19. Is the recovered refrigerant recycled before it is returned to a motor vehicle air conditioner?**

- ☐ Yes You meet this requirement.  
☐ No You are not meeting this requirement. Your equipment is not being properly used. Refrigerant must be recycled or reclaimed prior to reuse.

**20. Does your business send refrigerant off-site?**

- ☐ Yes Go to the next question.  
☐ No **Go to question 24.**

**21. Does your business have records of where refrigerant is sent (name and address)?**

- ☐ Yes You meet this requirement.  
☐ No You are not meeting this requirement.

**22. Are the records kept a minimum of three years?**

- ☐ Yes You meet this requirement.  
☐ No You are not meeting this requirement.

**23. Are the records on-site?**

- ☐ Yes You meet this requirement.  
☐ No You are not meeting this requirement.

## Technician Certification

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**24. Are the technicians certified by an EPA approved program?**

- ☐ Yes Your technicians meet this requirement.  
☐ No Your technicians are not meeting this requirement.

**25. Are the technician certificates kept on-site?**

- ☐ Yes You meet this requirement.  
☐ No You are not meeting this requirement.

**26. Is a copy of the technician certificate kept a minimum of three years after a technician ceases employment?**

- ☐ Yes You meet this requirement.  
☐ No You are not meeting this requirement.

## Purchase of EPA-Approved Substitute Refrigerants

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**27. Do your certified technicians purchase only EPA-approved substitute refrigerants that are intended for use in motor vehicles?** *(This rule does not apply to R-134a).*

- ☐ Yes    Your technicians meet this requirement.
- ☐ No      Your technicians are not meeting this requirement. Technicians certified to work on motor vehicles may only purchase EPA-approved substitute refrigerants that are intended for use in motor vehicles.
- ☐ N/A    R-134a is purchased.

### Other Refrigerant Information

Additional information can be found on the MPCA or EPA Web sites at:

<http://www.pca.state.mn.us/air/cfc-mvaircon.html>

<http://www.epa.gov/ozone/title6/609/>

If you have questions regarding the requirements for servicing motor vehicle air conditioners, please contact:

U.S. EPA, Region V  
Chicago, IL  
312-886-6816

MPCA Web site: <http://www.pca.state.mn.us>