Australian Government
Department of the Environment and Heritage

CoolChange
Newsletter for the Refrigeration and Air Conditioning Industry

Issue 2 Sept 2006

Compliance Audits - *What to Expect*

In our last issue, we mentioned that the Australian Refrigerant Council (ARC) has been actively conducting random compliance audits in all capital cities on companies that have been granted an authorisation.

In normal circumstances, companies that have been scheduled for an audit will be notified via mail prior to the inspection. The letter clearly details the areas covered by the audit and the audit is performed with minimal inconvenience to the business.

It is a requirement of the authorisation that the business will only allow appropriately licensed technicians to handle ozone depleting or synthetic greenhouse gas refrigerants. The audit will check to ensure that this condition is being met. A thorough audit of the refrigerant trail will also be carried out on the amount of gas that has been purchased, used, recovered and destroyed.

To date, the ARC has performed over 2000 audits. Only 25 percent of the companies audited have complied with all of the conditions of their authorisation. Many of the breaches are not categorised as serious. It is important that they are rectified to eliminate emissions of environmentally harmful refrigerant gases, and to comply with the conditions of your authorisation.

The Chief Executive Officer of the ARC, Alan Woodhouse, has indicated that the initial audits are to assist businesses. “The general approach has been to educate rather than punish companies that breach the conditions of the authorisation”, said Alan. “However”, he added, “businesses should be aware that not complying with the conditions of their authorisation may result in the authorisation being suspended or cancelled, or financial penalties being imposed.”

Australian Refrigeration Council Limited

In this issue

“Only 25 percent of the companies audited have complied with all of the conditions...”

Common Faults Found in Audits

The most common breach of the conditions of the authorisation has been the use of untested or unsafe gas cylinders that don’t meet the Australian standards [AS 2030.1-1999]. By law, the gas cylinders housing the gases should be checked and stamped every 10 years. Cylinders that have not been checked and approved not only pose an environmental threat, they are a serious Occupational Health and Safety problem, as the cylinders may cause serious injury should their structural integrity fail. Another dangerous practice witnessed regularly during the audits was the structural alteration to cylinders rendering them potentially dangerous and unfit for purpose (see picture). Common sense will tell you that this is a recipe for disaster. Are the safety of your staff and the welfare of your business worth the risk?

Experienced Persons Licence No Longer Available

Since July 2005, under the Ozone Protection and Synthetic Greenhouse Gas Management Regulations 1995 all technicians who handle refrigerants must possess a relevant Refrigerant Handling Licence.

To assist industry with the transition to the new national licensing system, Experienced Persons Licences were made available to people who had been working in the industry to give them a minimum of 12 months to ensure they had the correct qualifications, skills and abilities to obtain a Refrigerant Handling Licence. This transition period has come to an end and from 1 July 2006, Experienced Persons Licences are no longer available.

Transitional Industry Specific Licences

Over the past 12 months, a number of industry sectors have approached the Department of the Environment and Heritage to discuss the need for additional industry specific licensing, to recognise the unique competencies required to minimise emissions from that sector.

Discussions are continuing with these sectors, and as a provisional response, a number of transitional licences are now available.
If you do not already have an Experienced Persons Licence, or your licence is about to expire, and you work in the maritime, aviation or transport refrigeration industries, recover refrigerant from equipment, or decant refrigerant between cylinders, you may be eligible for a transitional licence.

These transitional licences will allow you to handle refrigerant in compliance with the regulations, while the need for, and competencies associated with, licensing these sectors is further investigated.

To apply for a transitional licence, visit the ARC web site at www.arctick.org or call us on 1300 884 483.

Australian Standards

All licensed technicians and authorised companies are required to handle refrigerant in accordance with relevant Australian standards and codes of practice. As such, we strongly advise that technicians and companies take the necessary effort to familiarise themselves with these standards as soon as possible.

A comprehensive list of these standards can be found under the ‘News’ link on the ARC website www.arctick.org.

For more information, or to obtain copies of the Australian Standards, visit www.sai-global.com

Revisions to HB40 - the Australian Refrigeration and Air Conditioning Code of Good Practice and the MTAA Automotive Code of Practice are expected to be completed within the next few months. However, the current versions of the above codes will remain in force until the revisions are released and incorporated into the Ozone Protection and Synthetic Greenhouse Gas Management Regulations.

Refrigerant Returned For Destruction

Wholesalers of ODS / SGG refrigerants are required to accept return of these products, from the holder of a Refrigerant Trading Authorisation, to be disposed of by a registered refrigerant destruction facility. The Authorisation holder is currently entitled to claim $5 per kilogram for returned reclaimed refrigerant.

Journeyman’s / Allied Trades Courses

The last issue of *CoolChange* advised of the acceptance of trade outcome certificates as qualification for a full RAC licence, provided the applicant has worked as a refrigeration mechanic for at least 4 years.

To be eligible, technicians must have completed a course of study such as a Certificate III in Electrotechnology Refrigeration and Air Conditioning (UTE30999) or MEM30298 Certificate III in Engineering (Mechanical-Refrigeration and Air Conditioning) with a training provider and supply evidence of 4 years relevant industry experience.

Risk Management: Your Obligations

Risk management planning makes good business sense.

Lost refrigerant not only impacts on the environment but it also contributes to an unnecessary net business loss.

Refrigerant is an expensive commodity and even small leaks can amount to large monetary loss over a period.

The implementation of a Risk Management Plan (RMP) is a condition of Refrigeration and Air Conditioning (RAC) authorisation.

This means that if your company has an authorisation, the business has an obligation to develop a RMP and this will form a part of the audit that is performed by the Australian Refrigerant Council (ARC).

Developing a RMP does not have to be a complicated project.

To make the whole exercise easier, the Department of the Environment and Heritage has developed a Risk Management Guide to assist businesses in establishing their own RMP.

The main objective of the RMP is to help the business:

- minimise emissions
- reduce the use of ozone depleting or synthetic greenhouse gas refrigerants
- increase environmental responsibility
- raise industry standards.

Visit the ARC web site to download the Risk Management Guide for free.

Companies that already have a RMP should remember the following.

- The RMP does not replace the need to ensure that workers have the skills to properly handle refrigerants.
- It does not replace the need for workplace supervision to ensure that the documented procedures are actually put into action.
- All levels of employees that are involved in the process need to be made aware of the RMP details.

Plug It Before You Fix It

Some concern has been expressed by industry regarding the *CoolChange* June article under the above heading. The following explanation is a guide to both Automotive and Stationary industry sectors.

The addition of any ODS or SGG refrigerant to any refrigeration, air-conditioning or automotive air-conditioning system in order to “top up” shall not be carried out.

1 Should a refrigerant leak be suspected within the system, existing refrigerant in the system may be used to locate refrigerant gas leakage before being reclaimed from, or relocated within, the system to allow for the repair to be carried out.

2 Systems that present with no refrigerant gas or insufficient refrigerant gas to allow for leak testing should have any refrigerant gas reclaimed and then be pressurised with dry nitrogen and leak tested with bubbles. This may involve component removal for testing.

3 If after testing with dry nitrogen and following the procedures set out in the code of practice, no leak is found, the system may then be charged to a maximum 300KPA (45PSI) with R134a and a suitable electronic leak detector used. If no leak is found the refrigerant must be recovered and the system serviced in accordance with the code of practice.

4 Dye should only be added to a system after the initial corrective action has taken place and NOT used to locate initial leaks. The dye will then allow for tell-tale testing of the system on subsequent service. The practice of charging a system with refrigerant and dye in order to locate the initial refrigerant leak is no longer acceptable.

The above explanation does not preclude existing sound trade practice such as visual inspections. Remember, you are required to comply with the relevant standards and codes of practice as laid down within the regulations.

Attention all Trainees and Apprentices

From 1 July 2005, any person who handles fluorocarbon refrigerant is required to hold a national Refrigerant Handling Licence – this includes all trainees and apprentices who are required to handle refrigerant as part of their training. TAFE Colleges and other registered training organisations require all apprentices/trainees to hold a current Refrigerant Handling Licence before undertaking practical competency modules involving handling of ODS and/or SGG refrigerants.

To apply for a trainee licence you must be enrolled in a course where you are required to handle refrigerant, and you will need to be appropriately supervised whilst handling refrigerant. Application forms are available from www.arctick.org or can be mailed on request. The form must be completed and mailed back to ARC together with a certified passport size colour photograph and a copy of the relevant training agreement or evidence of enrolment in an acceptable certificate course. The application fee for a trainee licence is discounted to $20 per year until the course is completed.

USEPA Points to Australia's Refrigerant Management as World Class

The environmental efforts of Australia's air conditioning and refrigeration industries have been recognised by the United States Environmental Protection Agency (USEPA) at an international awards ceremony held in Washington DC in May 2006.

Refrigerant Reclaim Australia has been awarded a prestigious Climate Protection Award in recognition of "leadership, personal dedication and technical achievements in protecting the earth's climate."

In an international search for outstanding personal, government and corporate efforts to protect the climate, the USEPA considered Refrigerant Reclaim Australia to be a global leader in the environmental management of refrigerants.

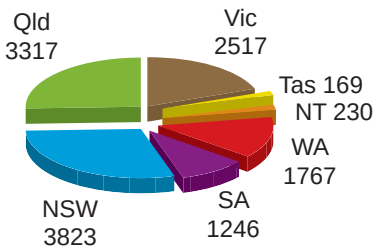
Refrigerant Reclaim Australia is a not-for-profit body that has been formally responsible for the recovery and safe destruction of HFC refrigerants since early 2004.

Accepting the award on behalf of Refrigerant Reclaim Australia, General Manager, Michael Bennett, said the success of the organisation reflected the industry's commitment to build on its experience in phasing out ozone-depleting refrigerants, and to continue to strive for the best practicable environmental outcome.

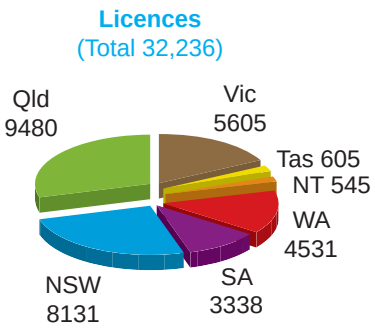
What a quarter it has been!

The last three months have been extremely busy months for the Australian Refrigerant Council, with more than 13,000 phone calls answered, 6,700 licence applications and 1,000 trading authorisations processed. the sudden burst of activity was mainly attributed to the deadline which required that all unlicensed technicians apply for an Experienced Persons Licence before the end of June 2006. These recent applications have greatly increased the number of technicians and companies that comply with the new regulations.

Breakdown of total authorisations and licences processed in each state:



Authorisations
(Total 13,069)



Licences
(Total 32,236)

Hydrocarbons and Licensing

What's the Connection?

There has been some confusion about what type of licence is required by people who work with hydrocarbon refrigerants.

Hydrocarbon refrigerants are not covered by the new national licensing system. However a refrigerant handling licence is required if a technician handles fluorocarbon refrigerant, including evacuating a system prior to charging with hydrocarbon.

A transitional refrigerant recovery licence is available for this type of work. In addition, handlers of hydrocarbon refrigerants are still subject to any relevant state and territory laws, particularly those relating to consumer protection and occupational health and safety.

Have you changed address?

To keep you informed of issues relevant to your profession, we need your correct mailing address. We respectfully request that you advise us of any changes to your contact details via email to enquire@arctick.org.