

# Technician Certification (Section 608): Steps For Replacing a Lost Card

PLEASE NOTE: Technician certification cards do not expire. You do not need to be re-certified if you have your card.

**STEP 1.** Is your testing organization that issued your certification still in business? Check the list of certifying organizations that are still operating [here](#).

Yes, my organization is still operating.

Go to that organization and get a replacement card. They are required to maintain records of people issued cards.

No. - Go to 2 below.

**STEP 2.** Do you have documentation from your original testing organization that demonstrates you passed the test or that shows you were certified? Or do you have a copy of your lost card?

Yes. I have documentation from my original testing organization.

Go to the [list of certifying organization that will replace cards](#). Send a copy of your documentation to one of the organizations (who have volunteered to make cards for people who can't get them from their certifying organization) on the list . They will issue you a new card and they will maintain a record of your certification.

No. - Go to 3 below.

**STEP 3.** Is the record of your certification in our centralized files which were compiled from data submitted by certifying organizations that have gone out of business? Go to the [list of certifying organizations that have closed](#).

Yes, the record of my certification is in the data submitted by companies that have gone out of business.

Download and complete the [request for replacement card form](#). After completing the form mail or fax it to Nancy Smagin at EPA. Once it is received we will create a new card and mail it to you.

No. - Go to 4 below.

**STEP 4.** If you cannot answer "yes" to any of the steps above, you will need to retake the Section 608 certification test. Please go to the [Section 608 Technician Certification Programs](#) page to find testing organizations which meet your needs.

# Certifying Organizations That Will Replace Cards

From **Step 2**. List of Certifying Organizations, who have offered to make cards for people from organizations that are out of business if they have proof of their certification:

- Ferris State University  
605 South Warren Avenue  
Big Rapids, Michigan 49307  
(866)880-7674
- ESCO Institute  
1350 W. Northwest Highway, Suite 205  
Mount Prospect, Illinois 60056  
(800)726-9696
- Refrigeration Environmental Protection Association (REPA)  
348 Thomson Creek Road, Suite 303  
Stevensville, Maryland 21666  
(800)435-3331; Fax: (410)827-4484

From **STEP 3**. List of Certifying Organizations, no longer in operation, that have submitted data to EPA:

- Environmental Training Group Inc.  
428 McKinstry's Mill Road  
Linwood, Maryland 21791
- Department of Energy  
900 Independence Avenue, SW  
Washington, DC 20585
- State of Wisconsin, Department of Commerce (DILR)  
Department of Commerce  
201 W. Washington Avenue, 4th Floor  
Madison, Wisconsin 53707
- Technical Seminars  
P.O. Box 995  
Lombard, Illinois 60148-0995
- C.F.C. Reclamation and Recycling Service, Inc.  
P.O. Box 560  
Abilene, Texas 79604

# Request For Replacement Card

To request a replacement card download the [Request For Replacement Card form](#) (PDF, 70K) and complete the information. Once completed mail or fax your response to Nancy Smagin at EPA. If you have questions you may contact her at this email address: [smagin.nancy@epa.gov](mailto:smagin.nancy@epa.gov).

Nancy Smagin  
Environmental Protection Agency  
Mail Code (6205-J)  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Fax: (202) 565-2155  
Phone Number: (202) 343-2337

Return to [Technician Certification \(Section 608\): Steps For Replacing a Lost Card](#)

# Recordkeeping Requirements for Refrigerant Retailers

The sale of refrigerants is constrained by several EPA regulations. This fact sheet explains the requirements according to the identity of the purchaser and the seller. In all cases, the following guidance applies:

- These rules currently apply to sale of ozone-depleting refrigerants (CFCs, HCFCs, and blends containing these compounds).
- HFC refrigerants (e.g., HFC-134a) are not currently subject to these rules.
- All records related to the sale of refrigerants must be kept for three years.

Please call the hotline at the number above to receive a free copy of a paper version that formats this information into a single table.

Please follow the link for the relevant situation:

Selling a large cylinder to:

[a refrigerant installer](#) or [a refrigerant wholesaler](#)

Selling a small can to:

[a refrigerant installer](#) or [a refrigerant wholesaler](#)

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## Selling a Large Cylinder (e.g. 30 pounds) to a Refrigerant Installer

In this situation, the seller has two **required** actions:

1. The seller must either see 608 or 609 technician certification card; if the purchaser is uncertified but is purchasing for a shop or other facility, the seller must see evidence that at least one tech at that shop is certified (for example, a letter from the shop stating that Joe Tech is certified plus a copy of Joe Tech's card). The Seller must keep this information on file. The purchasing facility must notify seller when Joe Tech is no longer employed.
2. The seller must get an invoice listing name of purchaser, date of sale, and quantity of refrigerant purchased.

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## Selling a Large Cylinder (e.g. 30 pounds) to a Refrigerant Wholesaler

In this situation, the seller has one recommended action and one required action:

**Recommended:** You don't need to see 608 or 609 card. However, it is a

good idea to get a written statement certifying that the jugs will be resold, and stating name and business address of purchaser. Why? Because wholesalers are legally responsible for ensuring that people who purchase refrigerant from them are allowed under the Clean Air Act to purchase that refrigerant.

**Required:** The seller must get an invoice listing name of purchaser, date of sale, quantity of refrigerant purchased.

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## **Selling a Small Can to a Refrigerant Installer**

In this situation, the seller has two **required** actions:

1. See the technician's 609 certification card. Small cans may only be sold to a 609 technician. **608-certified technicians may not purchase small cans of ozone-depleting refrigerants.**
  2. The seller must get an invoice listing name of purchaser, date of sale, quantity of refrigerant purchased.
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## **Selling a Small Can to a Refrigerant Wholesaler**

In this situation, the seller has one recommended action and one required action:

**Recommended:** The seller must either see 608 or 609 technician certification card; if the purchaser is uncertified but is purchasing for a shop or other facility, the seller must see evidence that at least one tech at that shop is certified (for example, a letter from the shop stating that Joe Tech is certified plus a copy of Joe Tech's card). The Seller must keep this information on file. The purchasing facility must notify seller when Joe Tech is no longer employed.

**Required:** The seller must get an invoice listing name of purchaser, date of sale, quantity of refrigerant purchased.

# Overlap between Section 608 and Section 609

Section 608 of the Clean Air Act Amendments of 1990 directs EPA to establish requirements to prevent the release of ozone-depleting substances during the servicing, repair, or disposal of appliances and industrial process refrigeration. Section 609 of the Act establishes standards specifically for the service of motor vehicle air conditioners (MVACs). MVACs are included in the definition of appliances set forth in section 608; however, since their service and repair are regulated under section 609, they are not subject to the servicing requirements under section 608. Procedures involving MVACs that are not covered by section 609, such as the disposal of MVACs and the purchase of refrigerant for use in MVACs, are covered by section 608. Below is information concerning specific areas where the overlap between these two sets of regulations may require additional clarification.

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## Technician Certification

Both regulations require that technicians become certified. Technicians who repair or service MVACs must be trained and certified by an [EPA-approved section 609 program](#). These programs are specifically designed to cover MVAC recycling equipment in accordance with Society of Automotive Engineers (SAE) standards and section 609 regulatory requirements. After completing a required training program, MVAC technicians must pass a test to become certified. These tests are different from the [section 608 certification tests](#).

Under section 608, EPA has established four types of certification for technicians who service and repair appliances other than MVACs. These technicians must be certified by passing a test in the appropriate area. All training and review classes for section 608 are voluntary; only passing the test is mandatory. The four categories of certification are:

- Type I = small appliances
- Type II = high-pressure appliances, except small appliances and MVACs
- Type III = low-pressure appliances
- Type IV (Universal) = all appliances except MVACs

In addition, people who service or repair MVAC-like appliances (e.g., farm equipment and other off-road vehicles) can choose to be certified under either the section 609 program or the section 608 Type II program. Due to similarities between MVACs and MVAC-like appliances, EPA recommends that technicians servicing MVAC-like appliances consider certification under section 609. Note that while buses using CFC-12 are MVACs, buses using HCFC-22 are not MVACs or MVAC-like appliances, but rather are high-pressure equipment covered under Type II of the section 608 test.

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## Sales Restriction

Under EPA regulations, only certified technicians may purchase CFC or HCFC refrigerants. However, the Clean Air Act itself further restricts the sale of small containers of these refrigerants. Specifically, the Act states that only section 609 technicians may purchase small cans (less than 20 pounds) of CFC and HCFC refrigerants suitable for use in a motor vehicle (ozone-depleting MVAC refrigerants). Therefore, section 608 technicians may not purchase small cans of these refrigerants.

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## Recordkeeping

Section 608 requires that all persons who sell CFC and HCFC refrigerants retain invoices that indicate the name of the purchaser, the date of the sale, and the quantity of the refrigerant purchased. These requirements are for all sales affected by section 608. However, since the sale of small containers of ozone-depleting MVAC refrigerants is restricted to section 609 technicians, these recordkeeping requirements do not apply to the sale of small containers of these refrigerants. Therefore, while records must be maintained for the sale of all other refrigerants in any size container, and for the sale of ozone-depleting MVAC refrigerants in containers of 20 pounds or more, it is not necessary to maintain records for the sale of small containers of ozone-depleting MVAC refrigerants. For more information about recordkeeping, see the fact sheet [Recordkeeping Requirements for Refrigerant Retailers](#)

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## Is it governed under 608 or 609?

- First, ask: Is the equipment used to cool the driver's/passenger's compartment, or is it used to cool refrigerated cargo? If cargo, then 608 (Type II certification) controls.
- If it is used to cool the passenger compartment, then ask: Does the equipment use CFC-12 or a replacement for CFC-12 such as HFC-134a? If no, then 608 (Type II certification) controls.
- If yes, then ask: Is the compressor hermetic or open-drive? If hermetic, then 608 (Type II certification) controls.
- If open-drive, then ask: Is the vehicle an on-road or off-road vehicle? If off-road, then 608 (rules for MVAC-like appliances) governs. If on-road, section 609 governs.

### **What does the sales restriction cover?**

The sales restriction covers all CFC and HCFC refrigerants, except for refrigerants contained in air conditioners and refrigerators. Thus, the restriction covers refrigerants contained in:

- bulk containers (cylinders or drums), and
- pre-charged parts

Refrigerant blends containing HCFCs are restricted (e.g., FRIGC FR-12, Free Zone, Hot Shot or R-414B, GHG-X4 or R-414A, Freeze 12).

Note: Effective January 27, 1995, the restriction on the sale of pre-charged split systems has been stayed while EPA reconsiders this provision of the sales restriction.

The restriction excludes:

- refrigerant contained in refrigerators or air conditioners, such as:
  - household refrigerators,
  - window air conditioners,
  - packaged air conditioners, and
  - split systems, until EPA can complete reconsideration of this provision
- pure HFC refrigerants (e.g., R-134a is excluded)

### **Who can buy refrigerant under the sales restriction?**

The following people can buy any type of refrigerant under the sales restriction (for instance, R-11, R-12, R-123, R-22, and R-12), except for "small cans" containing less than 20 pounds of R-12:

- technicians certified to service stationary appliances (i.e., Type I, Type II, Type III, or Universal certification) by a Section 608 [EPA-certified testing organization](#);
- employers of a Section 608 certified technicians (or the employer's authorized representative) if the employer provides the wholesaler with written evidence that he or she employs at least one properly certified technician; and
- manufacturers of air-conditioning and refrigeration equipment, where the refrigerant is used in the original manufacture of the equipment

The following people can only buy refrigerant found suitable for use in a [motor vehicle air conditioner](#) (for example, R-12, R-406A, R-414A, R-414B, etc.), including "small cans" containing less than 20 pounds of R-12:

- technicians certified to service motor vehicle air-conditioners (MVACs) by a [Section 609 EPA-certified testing organization](#)
- persons who buy refrigerant only for the purpose of resale to Section 609 certified technicians, such persons must provide written documentation (that includes the purchaser's name and address) to the seller stating that the refrigerant is only intended for resale.

### **When did the sales restriction go into effect?**

The sales restriction went into effect on November 14, 1994, for refrigerant contained in cylinders, drums, or pre-charged parts. The sales restriction on pre-charged split systems

went into effect on January 9, 1995, but is no longer in effect for these systems due to the January 27, 1995, stay.

Effective, September 22, 2003, EPA has limited the sale of ozone-depleting refrigerants intended for use with stationary refrigeration and air-conditioning equipment to section 608 technicians. Therefore, section 609 technicians are not allowed to purchase an ozone-depleting refrigerant that is not intended for use in MVACs (for, example HCFC-22 regardless of container size).

Note, that for purposes of maintenance, repair, service, or disposal that buses using R-22 are not defined as MVACs; therefore, section 608 certification is required to service buses using R-22.

**What does EPA consider a "part"?**

EPA considers a "part" to be any component or set of components that makes up less than an appliance. For example, this includes line sets, evaporators, or condensers that are not sold as part of a set from which one can construct a complete split system or other appliance.

**When does EPA consider a part to be "pre-charged"?**

EPA considers a part to be "pre-charged" if it contains a CFC or HCFC that will become part of the operating charge of an appliance. Parts that contain CFCs or HCFCs that will not become part of the operating charge, such as thermal expansion valves whose bulbs contain CFCs or HCFCs, are not considered "pre-charged." Similarly, parts that contain only "holding charges" of nitrogen are not considered "pre-charged."

**What does EPA consider a "pre-charged split system"?**

EPA considers a "pre-charged split system" to be a set of parts, at least one of which is pre-charged, from which one can assemble a complete air-conditioning or refrigeration system. This may include a pre-charged condenser, pre-charged evaporator, and pre-charged line set, or simply a pre-charged condenser sold along with an evaporator and line set containing only nitrogen.

**Can wholesalers sell different components of pre-charged split systems (e.g., evaporators and condensers) at different times to uncertified individuals?**

Wholesalers may sell different components of pre-charged split systems at different times to uncertified individuals as long as the wholesaler has reason to believe that these will be assembled into new split systems.

**What precautions must wholesalers take to ensure that persons who claim that they are purchasing refrigerant only for resale to certified technicians are actually doing so?**

Wholesalers are legally responsible for ensuring that people who purchase refrigerant from them fit into one of the categories of people who can purchase refrigerant under the sales restriction (see the second question and answer above). Although the regulation does not specify precautions that wholesalers must take to verify the intent of individuals purchasing refrigerant for resale, EPA recommends that wholesalers who sell refrigerant for resale obtain at least a signed statement from the purchaser. This statement would state that the purchaser is purchasing the refrigerant only for eventual resale to certified technicians.

**I understand that EPA recommends that wholesalers keep a list of persons (either by name or job title) who are authorized to pick up refrigerant for contractors who employ certified technicians. What if a contractor sends someone, such as a family member, to pick up refrigerant who is not on the list? What if a contractor wishes to have refrigerant delivered to his place of business when no employees or other authorized persons are present?**

The rule states that wholesalers "may sell refrigerant to the purchaser or his authorized representative" if the purchaser provides evidence that he employs at least one certified technician. It is the wholesaler's responsibility to determine whether persons who claim to represent a refrigerant purchaser are indeed authorized representatives; EPA recommends, but does not require, that wholesalers keep lists of authorized representatives to help with this determination. Thus, if a wholesaler knows that a certain person is an authorized representative of a purchaser, then the wholesaler may sell that person refrigerant as the representative, even if the person does not appear on the list of representatives.

Similarly, if a wholesaler knows that refrigerant delivered to the location of a purchaser when no one is present will ultimately be received by the purchaser or his authorized representative, then the wholesaler may deliver the refrigerant without obtaining the signature of an authorized representative.

**Do wholesalers have to record the quantity of refrigerant sold in a pre-charged part?**

Under the regulations, persons who sell CFC or HCFC refrigerants must retain invoices that indicate the name of the purchaser, the date of sale, and the quantity of refrigerant purchased. This applies to refrigerants contained in pre-charged parts as well as refrigerants contained in cylinders or drums. However, EPA recognizes that while the quantity of refrigerant contained in a pre-charged part may be standardized by the make and model of the part, this quantity may not be immediately obvious to the wholesaler. Therefore, rather than attempt to estimate the quantity of refrigerant in a pre-charged part, wholesalers may simply record the identity of the pre-charged part (e.g., make, model, and number) along with the purchaser and date of sale. EPA believes that most invoices already contain this information.