

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



August 15, 2022

OFFICE OF
AIR AND RADIATION

Ms. Nicole Coleman
Course Director
The Training Center
113 Monmouth Road, Suite 1
Wrightstown, New Jersey 08562

Dear Ms. Coleman:

The Environmental Protection Agency (EPA) has reviewed your application for approval as a technician training and certification program under section 609 of the Clean Air Act (CAA) and determined that it meets the requirements for approval as an EPA program.

The Training Center's training and certification program consists of an online study guide covering the material specified in 40 CFR Part 82 Subpart B, followed by a 30-question online exam. The study guide, training videos, and exam will be provided via the Learning Management System (LMS) developed by Fingent. LMS requires individual log in and credentials that will be added to the customer database. Exam questions will appear one at a time on the screen with questions re-arranged randomly each time the page refreshes. The exam will generate different questions if/when the student navigates back to the study guide. Exams will be graded electronically by LMS, and results will be provided to the student (and stored in The Training Center's database) immediately upon exam completion. The Training Center will provide each technician who takes the test and receives a passing score of 72% or higher a certificate with a unique ID that can be printed. The Training Center may also provide a wallet-sized card to certified technicians. All records are saved in Google Sheets and accessible to appropriate staff.

Pursuant to 40 CFR 82.40, EPA hereby approves The Training Center's training program for certification of technicians. The range of materials is broad enough, with enough detail, such that technicians can be expected to learn the important aspects of using recovery/recycling/recharging equipment, and to understand the importance of refrigerant containment. This approval is limited to training and certification in the proper use of approved equipment that recovers and recycles automotive refrigerant, and meets the requirements of 40 CFR 82.36 and Appendices A and B to Part 82 Subpart B. The reasons for EPA's approval are described herein, as well as in the attached Background Document.

Individuals trained and certified under these programs will be considered properly trained and certified in accordance with the requirements of CAA section 609, provided they are trained and tested in the manner specified in the attached Background Document, including technical revisions required under 40 CFR 82.40(c).

If at any time an approved program is conducted in a manner not consistent with the representations made in the application for approval of the program under this section, the Administrator reserves the right to revoke approval. The Administrator also reserves the right to specify the need for technician recertification at some future date, if necessary.

In order to remain an EPA-approved training and certification program, The Training Center must periodically update its training and testing material to reflect the latest technological developments in motor vehicle air conditioner service and repair. The periodic updates should also take account of any revisions to EPA's regulatory requirements promulgated under CAA section 609. Training and testing material should be updated within 30 days of the publication of the revisions in the *Federal Register*. The Training Center should provide EPA with a written report every two years of any technical revisions in its instructional materials. In addition, The Training Center should inform EPA promptly of any changes in its program administration such as key personnel or changes of address.

EPA will maintain a list of approved technician training and certification programs for the benefit of the public. The following information about The Training Center's program will be included on this list:

The Training Center
113 Monmouth Road, Suite 1
Wrightstown, New Jersey 08562

If you have any questions, please contact Chenise Farquharson of the Stratospheric Protection Division at Farquharson.chenise@epa.gov or (202) 564-7768.

Sincerely,



Cynthia A. Newberg, Director
Stratospheric Protection Division

Enclosure

**CLEAN AIR ACT
SECTION 609
TECHNICIAN TRAINING AND CERTIFICATION PROGRAM
BACKGROUND DOCUMENT**

Applicant Name: The Training Center
Address: 113 Monmouth Road, Suite 1
Wrightstown, New Jersey 08562
Phone Number: (800) 392-3927

I. Regulatory Requirements

40 CFR 82.40 provides the following procedure and criteria for approval of section 609 technician training and certification programs:

(a) Any technician training and certification program may apply for approval, in accordance with the provisions of this paragraph, by submitting to the Administrator at the address provided in section 82.38(a), verification that the program meets all of the following standards:

(1) **Training.** Each program must provide adequate training, through one or more of the following means: on-the-job training, training through self-study of instructional material, or on-site training involving instructors, videos, or a hands-on demonstration.

(2) **Test Subject Material.** The certification tests must adequately and sufficiently cover the following:

(i) The standards established for the service and repair of motor vehicle air conditioners as set forth in the relevant appendices to this subpart. These standards relate to the recommended service procedures for the containment of refrigerant, extraction and recycle equipment, and the standard of purity for refrigerant in motor vehicle air conditioners.

(ii) Anticipated future technological developments, such as the introduction of blend refrigerants as substitutes for HFC-134a in motor vehicle air conditioners.

(iii) The environmental consequences of refrigerant release and the adverse effects of stratospheric ozone layer depletion as well as the adverse effects on the global climate system.

(iv) As of August 13, 1992, the requirements imposed by the Administrator under Clean Air Act (CAA) section 609.

(3) **Test Administration.** Completed tests must be graded by an entity or individual who receives no benefit based on the outcome of testing; a fee may be charged for

grading. Sufficient measures must be taken at the test site to ensure that tests are completed honestly by each technician. Each test must provide a means of verifying the identification of the individual taking the test. Programs are encouraged to make provisions for non-English speaking technicians by providing tests in other languages or allowing the use of a translator when taking the test. If a translator is used, the certificate received must indicate that translator assistance was required.

(4) **Proof of Certification.** Each certification program must offer individual proof of certification, such as a certificate, wallet-sized card, or display card, upon successful completion of the test. Each certification program must provide a unique number for each certified technician.

(b) In deciding whether to approve an application, the Administrator will consider the extent to which the applicant has documented that its program meets the standards set forth in this section. The Administrator reserves the right to consider other factors deemed relevant to ensure the effectiveness of certification programs. The Administrator may approve a program which meets all of the standards in paragraph (a) except test administration if the program, when viewed as a whole, is at least as effective as a program that does meet all the standards. If approval is denied under this section, the Administrator shall give written notice to the program setting forth the basis for his determination.

(c) Directors of approved certification programs must conduct periodic reviews of test subject material and update the material based upon the latest technological developments in motor vehicle air conditioner service and repair. A written summary of the review and any changes made must be submitted to the Administrator every two years.

(d) The Administrator reserves the right to specify the need for technician recertification at some future date, if necessary.

(e) If at any time an approved program is conducted in a manner not consistent with the representations made in the application for approval of the program under this section, the Administrator reserves the right to revoke approval.

(f) Authorized representatives of the Administrator may require technicians to demonstrate on the business entity's premises their ability to perform proper procedures for recovering and/or recycling refrigerant. Failure to demonstrate or failure to properly use the equipment may result in revocation of the technician's certificate by the Administrator. Technicians whose certification is revoked must be recertified before servicing or repairing any motor vehicle air conditioners.

II. Background of Applicant

The Training Center is a private, vocational school in New Jersey that has been in operation since 1982. It currently provides advanced technical training for technicians seeking

CAA section 608 certification, power plant operators, boiler operators, and refrigeration (commercial and IPR) operators. The Training Center's instructors have over 60 years of combined specialties and experience in training.

III. History of Application

On April 15, 2022, The Training Center submitted information for approval as a CAA section 609 technician training and certification program. Following review by the Agency, the program corrected any deficiencies noted. The Agency therefore determined this program as sufficient to approve.

IV. Analysis of Application

1. Adequate Training. 40 CFR 82.40(a)(1) requires that:

Each program must provide adequate training, through one or more of the following means: on-the-job training, training through self-study of instructional material, or on-site training involving instructors, videos, or a hands-on demonstration.

40 CFR 82.40 also requires that certification tests must adequately and sufficiently cover the following subject material:

(i) The standards established for the service and repair of motor vehicle air conditioners as set forth in Appendices A and B to this subpart. These standards relate to the recommended service procedures for the containment of refrigerant, extraction and recycle equipment, and the standard of purity for refrigerant in motor vehicle air conditioners.

(ii) Anticipated future technological developments, such as the introduction of blend refrigerants as substitutes for HFC-134a in motor vehicle air conditioners.

(iii) The environmental consequences of refrigerant release and the adverse effects of stratospheric ozone layer depletion as well as the adverse effects on the global climate system.

(iv) As of August 13, 1992, the requirements imposed by the Administrator under CAA section 609.

EPA believes that both the instructional material for each program and the test(s) should cover the same subject matter. In determining whether the training provided in The Training Center's program was adequate, EPA therefore looked at:

(i) Whether the information included in SAE standards J1989, J1991, and J1990 was adequately covered in the instructional material. EPA checked to see whether the material included the three CFC-12 purity standards contained in SAE Standard J1991. The material also had to mention that recovery/recycling equipment must meet the SAE Standard J1990, and it had to include the recommended service procedures contained in SAE Standard J1989.

(ii) Whether the information included in SAE standards J1628, J2298, J2099, J2064, J2211, J2788, J2810, J2843, and J2851 was adequately covered in the instructional material. The material had to include the requirements for recovery/recycling/recharging equipment under standards J2788, J2843, and J2851.

(iii) Whether the instructional material provided information on developments, such as the introduction HFO-1234yf, HFC-152a, and CO₂, paying special attention to whether the material discussed the incompatibility of different refrigerant systems and components.

(iv) Whether the environmental effects of CFC release and ozone depletion were described. Also, whether the climate change impacts of HFC release were described and how substitutes for HFC-134a, such as HFO-1234yf, CO₂, and HFC-152a, feature lower global warming potentials.

(v) Whether EPA's regulations implementing CAA section 609 were described.

The Training Center's training and certification program covers in adequate detail the material specified above, including the standards in SAE standard J1991, the procedures in SAE J1989, the additional requirements for recovery/recycling/recovery/recharging equipment, the requirements of section 609, and the requirement that recovery/recycling/recharging equipment be EPA-certified. It also covers technological developments such as the introduction of HFO-1234yf in new motor vehicle air conditioners, and the environmental consequences of refrigerant release. The training manual includes information on the incompatibility of CFC-12, HFC-134a, and HFO-1234yf systems, the destruction of stratospheric ozone molecules by CFCs, the health and environmental harm caused by damage to the stratospheric ozone layer, and the health and environmental harm caused by the release of high global warming potential refrigerants.

The range of self-study material is broad enough, with enough detail, such that technicians can be expected to learn the important aspects of using recovery/recycling equipment, and to understand the importance of refrigerant containment.

2. Test Subject Material. 40 CFR 82.40(a)(2) states that the certification tests must adequately and sufficiently cover the following subject matter:

(i) The standards established for the service and repair of motor vehicle air conditioners as set forth in the relevant appendices to this subpart. These standards relate to the recommended service procedures for the containment of refrigerant, extraction and recycle equipment, and the standard of purity for refrigerant in motor vehicle air conditioners.

(ii) Anticipated future technological developments, such as the introduction of refrigerant blends as substitutes for HFC-134a in motor vehicle air conditioners.

(iii) The environmental consequences of refrigerant release and the adverse effects of

stratospheric ozone layer depletion as well as the adverse effects on the global climate system.

(iv) As of August 13, 1992, the requirements imposed by the Administrator under CAA section 609.

The Training Center's exam consists of 30 questions on the SAE safety standards, as well as questions about the legal requirements of CAA section 609, the introduction of HFO-1234yf in new motor vehicle air conditioners, the destruction of stratospheric ozone molecules by CFCs, the health and environmental damage caused by depletion of the stratospheric ozone layer, and the reduced climate impact of substitute refrigerants for HFC-134a.

3. Test Administration. 40 CFR 82.40(a)(3) states that:

Completed exams must be graded by an entity or individual who receives no benefit based on the outcome of testing; a fee may be charged for grading. Sufficient measures must be taken at the test site to ensure that tests are completed honestly by each technician. Each test must provide a means of verifying the identification of the individual taking the test.

The Training Center's training and certification program relies upon a 30-question online exam that is conducted as an open book, unproctored examination. Exam questions will appear one at a time on the screen with questions re-arranged randomly each time the page refreshes. The exam will generate different questions if/when the student navigates back to the study guide to ensure the integrity of the exam and the individuals taking the test. All exams will be graded electronically via the LMS system, and The Training Center will maintain a database of program participants and test results.

4. Proof of Certification. 40 CFR 82.40(a)(4) requires that:

Each certification program must offer individual proof of certification, such as a certificate, wallet-sized card, or display card, upon successful completion of the test. Each certification program must provide a unique number for each certified technician.

The Training Center provides each technician who receives a passing score of 72% or higher with a certificate and possibly a wallet-sized identification card. The Training Center will maintain records of graded tests and certified technicians via LMS. The Training Center will assign a unique, 5-digit identification number to each technician that they certify.