

Updated Halocarbon Management Program Training

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- This BGIS presentation has been prepared to train you on the new Federal Halocarbon Regulation 2022 (FHR, 2022) and on the related BGIS management system. It is acting as a reference but should not be taken as a legal document.
- For a comprehensive interpreting and applying of the FHR 2022, please consult the regulations at this link: [Federal Halocarbon Regulation](#)



- Business partner relationships are key for success, specially when there's a change to implement.
- All internal and external stakeholders collaboration to the new requirements will ensure BGIS and his clients remains compliant with the regulations.
- Your role and your later explain responsibilities are pillars to the compliance foundation required to protect BGIS and his clients interests in regards to the new FHR 2022.



- Halocarbons are man made ozone-depleting substances impacting the environment, especially the ozone layer.

In a building, halocarbons are commonly found in:

- Air conditioning units
 - Chillers
 - Air dryers
 - Drinking water fountains
 - Fire extinguisher or fire suppression system may also contain halocarbons
- Halocarbons are regulated by both federal and provincial regulations
 - Federal government published the new regulations replacing the old Federal Halocarbon regulations 2003 with the new **Federal Halocarbon Regulation 2022** in May 2022.
 - This change in regulations required **BGIS to make changes in the halocarbon management program** to ensure BGIS and its clients are compliant with FHR 2022, no matter if they are federally or provincially regulated.
 - The purpose of this training is to train you on the updated BGIS Halocarbon Program.

- **Small System/Container** = *contains or is designed to contain less than 10 kg*
- **Large System/Container** = *contains or is designed to contain 10 kg or more*
 - Historically, systems were defined by their **cooling capacity (5.4T)**, now it's based on the **charging capacity (10kg)**.
- **Activity:** *An installation, a service (Charging, Leak testing, leak repair or anything that requires touching of a refrigerant circuit,) a permanent withdrawal from use or a transfer of ownership.*
- **Service:** *Any work that is carried out on an air-conditioning system or refrigeration system, solvent system, fire-extinguishing system or container and that involves the components that contain or are designed to contain a halocarbon, such as the charging of a system or container with a halocarbon, the removal or reassembly of one or more components of the circuit containing a halocarbon or the detection and repair of leaks.*

- **Responsible person** to differentiate from Owner *means the person responsible for the service and operation of the equipment.*
- **Certified person:** *a person who holds a valid certificate recognized by at least 1 province and that is recognized by Canadian Forces or under the laws of Canada.*
- **Permanent withdrawal from use:** to remove confusion with systems that could come back into service after a certain time, “decommissioned” is not use anymore. *A system removed from the site for recycling/destruction.*

The term “**Service Log**” has now been replaced with “**Activity Log**”.

- BGIS has developed a new Activity log template to replace the old service log
- The new activity log is required for all halocarbon containing equipment regardless the size of the equipment
- **For any equipment containing 10 KG or more, the activity log must be filled for the following activities:**
 - Installation
 - Service (Charging/recovering, detecting a leak, repairing a leak, etc.)
 - Withdrawal from use/decommissioning
 - Transfer of ownership

Note: logging the transfer of ownership is a new requirement that needs to be logged in the activity log. It was not previously required.

- **For any equipment containing less than 10 KG** , the activity log must be filled for the following activities.
 - Service (Charging/recovering, detecting a leak, repairing a leak, etc.)
- **The activity log does not need to be completed for installation, or permanent withdrawal from use or transfer or ownership for systems under 10 KG, unless you are touching the refrigerant circuit which is considered a “service”.**
- Every time an activity log is updated; a picture of the log must be submitted to odptag@bgis.com or to your BGIS representative (FM).

Section 1					SECTION 1 - HALOCARBON EQUIPMENT ACTIVITY LOG - Air Conditioning and Refrigeration Systems			
BGIS Equipment ID:	1	<hr/>	Manufacturer:	6	<hr/>			
Client Equipment ID:	2	<hr/>	Model Number:	7	<hr/>			
Responsible person:	3	<i>BGIS</i>	Serial Number:	8	<hr/>			
System/Container owner name:	4	<hr/>	Location of System/Container:	9	<hr/>			
System/Container address:	5	<hr/>	Type of equipment:	10	<hr/>			
City:	5	<hr/>	Type of Halocarbon:	11	<hr/>			
Province:	5	<hr/>	Charging Capacity: (KG only)	12	<hr/>			

Section 2					Section 3				
SECTION 2 - COMPLETE BELOW FOR ANY INSTALLATION, SERVICE, WITHDRAWAL/TRANSFER					SECTION 3 - LEAK TESTING, RECOVERY / CHARGING				
A	Activity Date year / mm / dd	Work Order Number	Certified technician name	Employer of certified technician	Certificate Number	Leak Test Performed	Leak Detected	Quantity (KG) of Halocarbon Recovered	Type & Quantity (KG) of Halocarbon Charged
	/ /	B	C	D	E	Y / N	Y / N	J	K
	Type of Activity (circle applicable box)	Installation	Service	Transfer Ownership	Permanent Withdrawal	NOTE: Report ANY / ALL leaks (within 24 hrs) to BGIS site contact AND safety@BGIS.com			
	Activity Description:								

- Section 1 must be completed every time a new activity log is started for an equipment.
 - All fields in section 1 are mandatory. For any missing information, please reach out to BGIS’s facility manager.
- Section 2 must be completed every time a new activity is performed on an equipment
- Section 3 must be completed every time there is a halocarbon leak test
- For any questions, please reach out to safety@bgis.com

SECTION 1

- 1 **BGIS Equipment ID:** BGIS ID which is the BIT (Building Item Number) i.e., B0000-25-030-00001
- 2 **Client Equipment ID:** Client own equipment ID.
- 3 **Responsible Person:** Must always be BGIS when the site is under BGIS responsibility.
- 4 **System/Container Owner Name:** Name of client or tenant who owns the system/container.
- 5 **System/Container Address:** Same as where the system is located.
- 6 **Manufacturer:** Manufacturer of the unit and/or the brand
- 7 **Model Number:** Manufacturer's Model Number of the unit
- 8 **Serial Number:** Manufacturer's Serial Number of the Unit
- 9 **Location of System/Container:** Where the equipment is located within the building
- 10 **Type of Equipment:** Air-Conditioning System, Refrigeration System, Fire-Extinguishing System, solvent system and containers
- 11 **Type of Halocarbon:** "R22", "R123" etc.
- 12 **Charging Capacity:** System charging capacity in **KG only**.

SECTION 2 & 3

- A **Activity Date:** Date of the activity performed on the system/container.
- B **WO Number:** BGIS WO number
- C **Certified Technician Name:** Name of the certified technician working on the system/container.
- D **Employer of Certified Technician :** Name of the company the certified technician's working for.
- E **Certificate Number:** Certified technician ODP certificate number.
- F **Activity Type:** Circle the type of activity performed : Service performed on equipment (leak test, repairs, as soon as refrigerant circuit is involved.) Installation of a new system/container. Transfer of ownership. Permanent withdrawal from site.
- G **Activity Description:** Describe with precision the activity performed on this date. When there's a leak involved, provide clear details on the cause and repairs of the leak. Include loss quantity.
- H **Leak Test Y/N:** When a leak test is performed (annual leak test, to found a leak, before charging, after repairs), circle YES. If not applicable for the activity, circle NO.
- I **Leak Detected Y/N:** After any leak test performed, if a leak is found, circle YES. If there's no leak, circle NO.
- J **KG Recovered:** The quantity of halocarbon recovered from the system/container in kilograms.
- K **Type & Quantity of Halocarbon Charged:** The type and quantity of halocarbon charged in kilograms.
- L In order to protect BGIS and its client's interests, **all halocarbon leaks, no matter the size, must be reported in no later than 24h** to BGIS safety@bgis.com and to the BGIS site contact.

- As per FHR2022, **All halocarbon equipment containing 10KG or more are subject to inventory tracking.**
- BGIS CMMS team is in the process of ensuring all **missing data fields are captured in our CMMS system**
 - Clear instructions to capture missing data has been placed in WO description for HVAC vendors and BGIS HVAC technicians)
 - Collect/update required data (Refrigerant type, Charging Capacity (KG), specific location).

- **The ODP tags are not required by FHR 2022, However BGIS has decided to continue using the ODP tags** for the following two reasons:
 - ODP tags are required by **provincial regulations**
 - HVAC technicians can't renew their ODP license or purchase refrigerant without ODP tags
- **3rd party vendors can use their own tags**, but must use the BGIS Activity log.
- **ODP tags should be filled out for all type of activities**
 - Installation of new system
 - Service (charging/recovering, detecting a leak, repairing a leak, etc.)
 - Decommissioning or permanently withdrawing a system from service
 - Transfer of ownership
- Every time an ODP tag is filled, it should be sent to ODPtag@bgis.com and or to your BGIS representative (FM).

- The FHR 2022 requires that all large halocarbon containing equipment (equipment containing >10kg of halocarbon) have one leak test at least once every calendar year and no more than 15 months since the previous leak test.
 - Annual Leak test interval modified from once **every 12-months** to **at least once every calendar year with no more than 15 months from the date of the previous leak test.**
 - **Majority of the accounts do not conduct semi-annual (every 6 months) leak tests anymore.** Moving forward, semi-annual leak tests are no longer tracked as a required activity due to the flexibility of the new FHR.

- If a leak is detected, **Within 7 days the leak must be repaired, or the leaking component must be isolated and halocarbon recovered.** In case where the component can't be isolated, the entire halocarbon charge must be recovered.
- Whenever it's not possible in order to not put the building or the health & safety at risk, a written authorization should be asked and obtain from ECCC through your BGIS representative.
 - Any questions related to leak testing frequencies and schedule can be sent to your BGIS representative and or to cmms@bgis.com

- All halocarbons from all halocarbon containing systems regardless the size of equipment (equipment containing >10kg of halocarbon) must be properly recovered prior to decommissioning or permanent removal from use
 - For **small systems**, it is not required to recover halocarbons if the system/container is being transferred to a new owner.
 - This means small ac units such as window shaker etc can be moved from one location to another location without removing halocarbon from it if its transfer does not result in a release.
- Once all halocarbons have been properly removed, **a notice of permanent withdrawal from use/decommissioning tag must be placed on the system/container. BGIS activity log and tag should be used as the notice.**
- An entry is required in the BGIS activity log that clearly identifies that the system/container was permanently withdrawn from use. **The record of its withdrawal from use must be available for the next 5 years.**

- BGIS leak reporting process is the following:
 - HVAC technician (BGIS/3rd party vendors) must immediately report the leak to the FM upon discovery and provide update as soon as the repairs are completed.
 - Picture of tag and activity log must be to ODPtag@bgis.com and or to your BGIS representative.

- The following **halocarbon records must be for 5 years**. These records can be kept in **electronic format or paper copies**. If keeping in electronic format, they must be available for review on site at all times.
 - Activity logs and tags
 - Required for all system regardless the charging capacity of the system, when applicable.
 - Copies of written halocarbon leak reports to AHJ
 - Permanent withdrawal from service notice
 - Activity log and tag can act as the notice
 - Halocarbon Inventory log for all large equipment (any equipment with charging capacity equal or more than 10 KG) [Federal Clients Only]



- For any questions, please reach out to you BGIS representative or to **safety@bgis.com**

Thank you!!