

ACTION ITEM NO: 6-31

DATE SUBMITTED: 18 JUN 99

SUBMITTED BY: CG SECOND MAW

PROBLEM:

ST-1000 Freon Recovery Unit.

DISCUSSION:

As previously stated in Action Item 6-24, 19 Jul 98, the ST-1000 are an ineffective unit. This unit is designed for larger Air-Conditioning systems with larger amounts of Freon and not for systems of (8) eight lbs. or less. Now to completely reclaim a unit to a vacuum, it can take upwards of (2) two to (3) three hours depending on the outside temperature. The Action Item goes on to refer to a Snap-On Kool Kare system which is strictly manufactured for R12, but with the flip of a dipswitch the unit will accept R22. If dipswitch settings are changed, Snap-On will not warrant the item.

RECOMMENDATION:

The Robinair Recovery & Recycling System, Model 17800A, recovers, recycles, evacuates, and charges refrigerants. It is designed for R12, R22, R134A, R502, and small type systems. Purchase price is \$5,300. This item should be SERDED into IMRL, as a Mobile Facility (MF) system only.

STATUS: 07 JUL 99

ACTION AGENCY:

TBD

COMPLETION DATE:

TBD

STATUS: 15 JUL 99

ACTION AGENCY:

PMA-260/P2

Open. PMA-260 took for action during Logistics Review Group (LRG) Meeting held at M.C.A.S. Miramar on 15 Jul 1999, is to investigate the feasibility of procuring the recommended Robinair Recovery & Recycling System, Model 17800A, and report findings.

The following are comments submitted by 3rd MAW @ the Logistics Review Group (LRG) held @ M.C.A.S. Miramar 13-15 1999:

The Marine Corps' Mobile Facility (MF) Program currently utilizes the ST-1000 Refrigerant Recovery System to evacuate Air-Conditioner (A/C)'s. The problem is, according to Environmental Protection Agency (EPA) regulations, equipment used to recover refrigerant directly from (A/C) and refrigeration equipment must be certified by (ARI) or (UL) under the ARI 740-1993 standard, this is a National requirement. The ST-1000 is not certified by neither (ARI) nor (UL) Activity; see below attached letters.

Proposed Solution by 3rd MAW: Replace the ST-1000 with the Robin-Air Model No. 17800A which is certified by both (ARI) and (UL) for the recovery of R-22, which is used by the (MF) Environmental Control Unit (ECU)'s. This unit also has a digital scale, which allows you to recover "exact" amounts. The Unit-Cost equals **\$4,500.00**.

Attached Letter (1):

From: NCOIC W/C 990

To: NCOIC IMRL

Subj: EPA NON-COMPLIANCE

Ref: (A) AG-180AO-MMM-100 WP 7 Pg 5-6

(B) EPA Website <http://www.epa.gov>

(C) EPA Website <http://www.epa.gov.region/region04/air/cfc/608sum.htm>

Encl: (1) ARI (Air-Conditioning & Refrigeration Institute) Fax

(2) Underwriters Laboratories Inc. (UL) Fax

1. IAW Ref (A), the Environmental Conditions Units (ECU)'s for Mobile Facilities (MF) are to be evacuated via a vacuum pump and manifold gauges. IAW Ref (B), "equipment used to recover refrigerant directly from Air-Conditioning (A/C) and Refrigeration Equipment must be certified by (ARI) or (UL) under the ARI 740-1993 Standard." Per conversation with Donna Waller @ (202) 564-7034, this is a National requirement.

2. As per Ref (C), "The Agency has established a Certification Program for Recovery and Recycling Equipment. Under the Certification Program, Environmental Protection Agency (EPA) requires that equipment manufactured on or after November 15, 1993, be tested by an (EPA)-Approved testing organization to ensure that it meets (EPA) requirements." Additionally, "Equipment manufactured before November 15, 1993, including home-made equipment, may be grandfathered..." "...but equipment manufactured on or after that date, including home-made equipment, must be tested..."

3. MALS-11 W/C 990 is currently using a Refrigerant Recovery System Model No. ST-1000 manufactured by Refrigerant Recovery System Inc. This unit is **not** certified by (ARI) or (UL) as per enclosures (1) and (2). MALS-11 currently has two ST-1000's that were manufactured after November 15, 1993 These items were manufactured in 1997, their Serial are **1311** and **1312**.

4. Robin-Air Model No. 17800A is certified by both (ARI) & (UL) for the recovery of R-22, which is used by the Mobile Facility (MF)'s (ECU)'s. The price for the Robin-Air Model is **\$4,500.00** per unit. Robin-Air Point-of-Contact can be reached at (619) 233-3370.

5. We request the replacement of our (2) two **uncertified** Refrigerant Recovery Units with (2) two units as described in paragraph 4.

NCOIC W/C 990

Attached Letter (2):

ARI AIR-CONDITIONING & REFRIGERATION INSTITUTE 07 MAY 1999

MCAS MIRAMAR W/C 990

Fax: (619) 577-4056

This letter is in response to our phone conversation today and my phone conversation with Corporal Negron on 05 May 1999 requesting information regarding the status of a certain model within the **ARI** Refrigerant Recovery/Recycling Equipment Certification Program. The particular model you were inquiring about was Model No. ST-1000 manufactured by Refrigerant Recovery Systems, Inc.

I have checked **ARI**'s records and have found no evidence that any such model or any such manufacturer was part of the subject Certification Program. My understanding is that the model may still be approved by the U.S. Environmental Protection Agency (EPA), for instance if it was tested by another approved organization such as Underwriters

Laboratories (UL). If you wish to verify this, you may call the (EPA) @ 1-800-296-1996.

If you have any questions or additional requests, please write or contact me @ (703) 524-8800, Fax: (703) 524-9011.

Sincerely,

ARI Representative

Engineer, Research Projects

Engineering & Research

Enclosure: as stated

Attached Letter (3):

UNDERWRITERS LABORATORIES INC.

ENGINEERING SERVICES

SECTION 3015CNBK NORTHBROOK,IL U.S.A.

Date: 06 May 1999

Org: MALS-11 AVI W/C 990

Fax: (619) 577-4056

From: **ARI** Air Conditioning & Refrigeration Institute

Ref: Section 608

Subj: Refrigerant Recovery/Recycling Equipment

This confirms our conversation of today. The Refrigerant Recovery/Recycling Equipment manufactured by Refrigeration Recovery Systems Inc., Model No. ST-1000 is not Design Certified by (UL) in accordance with **ARI** 740 and U.S. (EPA) requirement in Section 608 of the Clean Air Act.

By separate cover, I am sending you a copy of the (UL) Directory, which covers Certified Commercial Refrigerant Recovery/Recycling Equipment.

ARI Representative

Office Phone No. (847) 272-8800, Ext. 42484

Section Fax: (847) 509-6225

COMPLETION DATE:

TBD

STATUS: 13 JAN 00

Closed. As per NAWCADLKE Code 3.1.4.4, request re-submit requirement to proper TYCOMS Chain-of-Command.