



Transportation of Refrigerants and Cylinders

MOPIA asked Transport Canada to help interpret some of their requirements for the transport of refrigerant cylinders and here is the information they provided (below):

In order to transport dangerous goods in Canada, the requirements of the Transportation of Dangerous Goods (TDG) Regulations must be met. Unless an exemption can be used, the product has to be, amongst other things:

- Classified as per Part 2 of the TDG Regulations;
- Transported in a prescribed means of containment and must bear the appropriate safety marks as per Part 4 and 5 of the TDG Regulations.
- Accompanied by a shipping document describing the dangerous goods as per Part 3 of the TDG Regulations.

All the activities linked to the transportation of dangerous goods must be done by a knowledgeable person who holds a training certificate (Part 6 of the TDG Regulations). Additional requirements can be found in Part 9 (Road), Part 10 (Rail), Part 11 (Marine) and Part 12 (Air) based on the mode of transportation selected.

You will find most exemptions in Part 1 of the TDG Regulations (Sections 1.15 to 1.49). You will find some other exemptions listed in Schedule 2 (Special Provisions) of the TDG Regulations that may exempt you from certain parts of the TDG Regulations.

500 Kg Gross Mass Exemption

This exemption will exempt a person from Part 3 (Documentation), Part 4 (Dangerous Goods Safety Marks) and Part 5 (Means of Containment) of the TDG Regulations if he/she meets all exemption conditions

Unlike the 150 kg Gross Mass Exemption:

- This exemption can be used even if the dangerous goods are not available to the general public.
- The dangerous goods do not need to be only transported by the user/purchaser or by a retailer to or from a user/purchaser.

Since you may not transport all dangerous goods under this exemption, it is important to verify Subsection 1.16 (2) of the TDG Regulations. It will list the products that cannot be transported under this exemption.

\$500,000 Fine Issued to Acklands-Granger Inc.



Acklands-Granger Inc. pleaded guilty on December 12, 2016 for contravening the Ozone-Depleting Substances Regulations (CEPA).

A \$500,000 fine was levied that will be directed to the federal Environmental Damages Fund.

www.ec.gc.ca/edf-fde/Default.asp?lang=En&n=BD1220D8-1

The company, headquartered from Richmond Hill, Ontario, has 172 branches across Canada, 6 distribution centres and upwards of 2,200 employees.

The Intelligence Division of Environment and Climate Change Canada's Enforcement Directorate investigated actions by the company between 2012-2014 and found they sold lubricant and aerosol products (including HV Switchgear and Sprayon EL 2204) which contained a prohibited HCFC substance, (HCFC 125).

See more details at: www.ec.gc.ca/alef-ewe/default.asp?lang=En&n=8F711F37-1

SD Permit Required to Purchase or Import in Manitoba

If your company imports into the province or purchases regulated products (anything attached to the closed refrigerant loop) or any regulated refrigerants (i.e. HCFCs, HFCs), your company should have a Secondary Distributor (SD) Permit. The SD Permit allows your company to purchase, import and have in possession regulated products.

There are over 450 companies in Manitoba that typically have the annual permit issued through MOPIA. The cost is \$50 as specified in the Manitoba ODS and Other Halocarbons Regulation 103/94. Companies that should have the permit include all wholesalers, distributors, auto dealers, ag implement dealers and the various air conditioning and refrigeration companies among others. Contact MOPIA if you need more info or for an application form or at mopia.ca

Let us know if you need more details or would like to apply for a 2017 SD Permit or visit our website for the application.





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Transport Canada article con't...

Below are some key points to remember:

- The total gross mass of all dangerous goods must not be greater than 500 kg. "Gross mass" includes the weight of the means of containment and all of its contents.
- The dangerous goods must be packed in means of containment that weigh 30 kg or less (**except for gases – see below**).
- The means of containment must be designed not to leak under normal conditions of transport.
- For dangerous goods included in Class 2, Gases, each means of containment has displayed on one side, other than a side on which it is intended to rest or to be stacked during transport the dangerous goods safety marks required by Part 4 (Dangerous Goods Safety Marks).
- You must not combine this exemption with:
 - Exemptions in Sections 1.15, 1.21 or 1.22; or
 - With a shipment of dangerous goods that requires a shipping document (e.g., a fully regulated shipment).

When using the "500 kg Gross Mass Exemption" for **Class 2, Gases**, there are two important things to remember:

- The cylinder must be certified and requalified for use in Canada and marked with the letters TC.

Cylinders certified for use in the United States will be marked with the letters "DOT". As a general rule, you may not use cylinders only marked with the letters DOT in Canada. You will find certain exceptions to this rule in Section 5.10(2)(c). It's possible that a cylinder can be certified for use in Canada and the United States. If this is the case, the cylinder will be marked with the letters "DOT/TC".

- Flammable gases, such as propane or acetylene, are limited to a cylinder capacity of 46L.

The TDG Regulations have other exemptions that may apply to your specific situation. They can be found in Sections [1.17](#), [1.32](#), [1.32.1](#), [1.32.2](#), and [1.32.3](#) of the TDG Regulations.

As with any exemption, if you cannot meet one of the specified conditions, then the exemption does not apply and you must comply with the entire TDG Regulations. This means you might need a shipping document, labelling, placarding, training, a certified container or package, etc.

It is essential to meet the requirements of the TDG Regulations to ensure public safety. For more information on Part 5 (Means of Containment) of the TDG Regulations, please consult: www.tc.gc.ca/eng/tdg/moc-menu-202.htm and for the latest news visit www.tc.gc.ca/eng/tdg/safety-menu.htm

Apprenticeship Plan Input Sought

The Apprenticeship and Certification Board of Manitoba is developing a Strategic Plan including priorities for the year and you can be part of its consultation on their draft. Comments are welcomed until January 20, 2017.

www.gov.mb.ca/wd/apprenticeship/boardpac/consultations.html

Control & Elimination of HFCs Critical for Planet

HFCs have been projected to contribute more to climate change in the short time than any other substance if left uncontrolled going forward. Fortunately, Parties to the Montreal Protocol agreed in Kigali this Fall to do just that. Controls are being put into place including in Canada. HFCs are super greenhouse gases. See more info at:

<https://treaties.un.org/doc/Publication/CN/2016/CN.872.2016-Eng.pdf>

https://courses.edx.org/c4x/DelftX/RI101x/asset/hfcs-a-growing-threat_greenpeace.pdf

www.policyalternatives.ca/publications/monitor/hfcs-must-be-phased-out

Refrigerant Records Must be Recorded and Submitted

It is mandatory that all (regulated) refrigerant use be documented. This includes CFCs, HCFCs and HFCs and all the combination of blends. Hydrocarbons (HCs) do not have to be recorded but you may if you wish as a service record for good practice.

All certified service technicians must submit to MOPIA a copy of their refrigerant use for all of 2016 by **February 1, 2017**. You may do this by email, fax or mail. We also need to know if there was no use as we keep statistics and it serves as a record of disclosure to us so we may document your submission.

A copy of the standard record data form is on our website but you may also create your own as long as it contains the required information.

Please note, it is the responsibility of each technician to ensure their records are submitted - so while some may rely on their employer to do so, **ensure** they do or you will may face actual penalties of up to \$50,000 and/or up to 6 months in prison!!