MVAC LEAK TESTING AND REPAIR – QUESTIONS AND ANSWERS

Does Wisconsin impose a leak test and repair requirement for motor vehicle air conditioning (MVAC) systems?

Yes. Wisconsin law requires technicians to inspect and, if necessary, repair leaking MVAC or trailer refrigeration equipment before adding refrigerant to these systems. Simply topping off a leaky system is prohibited.

This statutory leak repair requirement (s.100.45(4)(f), Wis. Stats.) is further clarified in s. ATCP 136.16(2), Wis. Adm. Code, which requires the technician to examine the MVAC system "using competent and reliable methods generally accepted in the industry" to determine whether the system is leaking refrigerant.

While these diagnostic methods are not specified by rule, recommended or required equipment include (1) a gauge set to test low-side and high-side pressures, (2) a leak detector appropriate for the refrigerant, (3) AC system dye and black light detection equipment, (4) a refrigerant identifier, and (5) approved refrigerant recovery/recycling equipment used for vacuum and pressure testing an MVAC system and for refrigerant recovery and recharging.

Is a repair business required to evacuate a MVAC system upon finding a leak if the customer refuses to proceed with repairs?

No. Wisconsin law states that refrigerant may not be added to a MVAC system until any leaks have been repaired. However, refrigerant may be added to an MVAC system to test for leaks. If a leak is found and the customer refuses to authorize repairs, the business should recover the refrigerant that was added to the MVAC system as part of the test charge, but no more.

Removing more than the refrigerant test charge or fully evacuating the system will place the technician in direct conflict with ch. ATCP 132, Wis. Adm. Code, related to Motor Vehicle Repair. Among other things, this regulation (1) requires customer authorization before proceeding with any motor vehicle repairs, and (2) requires a shop to leave the vehicle in the same condition that existed when the customer delivered the vehicle if he or she refuses to authorize additional repairs. Leaving the customer with a fully evacuated MVAC system will do more vehicle harm than environmental good.

What should you do when a customer refuses to repair a leaky MVAC system?

There are options. Newer recovery/recycling equipment allows the technician to measure the amount of refrigerant recovered, as well as the amount of refrigerant added to an MVAC system. This equipment makes it simple to recover only the refrigerant added to the system to test for leaks.

Another option is to offer a refund or credit for the customer's refrigerant that was evacuated in excess of a test charge but not returned to his or her vehicle by the shop.

Sealants

You should be aware of the limitations and potential problems posed by AC sealants. Although legal for use, the aftermarket sealant products are many and varied in composition, and data is lacking on their effectiveness. These products are not recommended for large leaks. AC sealants can also impair the functioning of refrigerant recovery/recycling equipment for the next technician who services the vehicle.

We suggest that you discuss your shop policies and procedures beforehand with the consumer. This will help to avoid customer misunderstandings or potential violations of the law.