

Completing the HFC Application-Specific Allowance Holder Biannual Report

HFC Allocation Rule Reporting Instructions June 2022

INTRODUCTION

This document describes each data element in the HFC Application-Specific Allowance Holder Biannual Report and provides step-by-step guidance for completing the form. To submit the report through e-GGRT, you must first be registered with the HFC & ODS Allowance Tracking System (HAWK) module within e-GGRT. Refer to EPA's reporting instructions on <u>Registration and Account Management</u> for more information on the registration process. If you have any questions on how to fill out your report, please email <u>HFCAllocation@epa.gov</u>. The remainder of this document is organized as follows:

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REPORTING SCHEDULE

The HFC Application-Specific Allowance Holder Biannual Report is due each year on July 31 and January 31, covering the previous six months of activity.

Due Date	Reporting Period Covered	Form Application and Requirements
July 31	January 1 – June 30	 Current application-specific allowance holders and entities requesting application-specific allowances for the first time can request allowances for the next calendar year through this report. Sections 1 – 7 must be completed.
January 31	July 1 – December 31	• Sections 1 – 3 must be completed.

TAB #1: COMPANY INFORMATION

Tab #1 must be completed when submitting the HFC Application-Specific Allowance Holder Biannual Report due July 31 and January 31.

Section 1 – Company Identification

Completion of Section 1 is required by all application-specific allowance holders **and** persons requesting application-specific allowances for the first time.

- **Company Name:** The name under which your company is registered in HAWK.
- **Company ID:** The ID assigned to your company in HAWK (e.g., AIM001). If you do not have an ID in HAWK, please contact EPA at <u>HFCAllocation@epa.gov</u>.

Section 2 – Application-Specific Data

Completion of Section 2 is required by all application-specific allowance holders **and** persons requesting application-specific allowances for the first time. The following information must be provided:

- Quantity Acquired through Conferring Allowances: The amount of each regulated HFC your company acquired through the conferral of allowances from an importer, producer, or supplier during the 6-month reporting period. Note that for this category, you are providing the quantity of HFCs you received that were directly the result of your conferred allowances and were imported or produced by another entity.
- Quantity of HFCs your Company Imported Expending your Allowances: The amount of each regulated HFC your company imported directly during the 6-month reporting period by expending your allowances. (Note: If you imported HFCs, you must also report this activity to EPA using the HFC Importer Quarterly Report.)
- Quantity of HFCs Purchased for Application-Specific Use without Expending or Conferring your Allowances: The amount of each regulated HFC your company purchased during the 6-month reporting period without expending your allowances (i.e., from the open market). HFCs bought on the open market means that you did not have to obtain them through expending or conferring your allowances as they may have: (1) been imported or produced prior to 2022; (2) were imported or produced with allowances after January 1, 2022; or (3) were reclaimed/recycled.
- Quantity Held in Inventory by the Reporting Company or Held under Contract by Another Company for the Reporting Company's Use: The amount of each regulated HFC held on the last day of the previous 6-month period (i.e., December 31 or June 30) in inventory by your company or held under contract by another company for your use.
- **Quantity Destroyed:** The amount of each regulated HFC your company <u>destroyed</u> during the 6-month reporting period.
- **Quantity Recycled:** The amount of each regulated HFC your company recycled during the 6-month reporting period.

Section 3 – Allowance Conferral Data

Completion of Section 3 is required only if you conferred application-specific allowances during the 6month reporting period. For each company to which allowances were conferred, provide:

- A contact name, email, and phone number.
- The total quantity of allowances conferred in metric tons exchange value equivalent (MTEVe). This information should align with information previously submitted to EPA via the HFC Conferral of Allowances Report.
- The name and amount in kilograms (kg) of each regulated HFC received.

TAB #2: ANNUAL REPORTING

Tab #2 must only be completed when submitting the HFC Application-Specific Allowance Holder Biannual Report due July 31. Do not complete this section in the report due January 31.

Section 4 – Transition Plan

Completion of Section 4 is required by all application-specific allowance holders. Describe plans to transition the regulated HFCs currently used in the specified application to those with a lower exchange value or to alternatives to regulated HFCs. This information may include the following:

- Alternatives actively being tested or that have been tested.
- The results of these trials.
- Plans to test alternatives in the future.
- Status of development, deployment, and/or commercialization of any alternatives that have been tested.
- Challenges or successes faced in the use or testing of alternatives.
- Use of reclaimed or recycled HFCs.

Section 5 – Additional Application-Specific Allowances for Next Year

Completion of Section 5 is required only if your company is requesting allowances *in addition to* what the Agency will calculate based on material acquired during the previous three years (as reported under Section 2 and Section 7). Additional allowances may only be requested due to one of the following unique circumstances, of which you can choose one or more:

- Demonstrated manufacturing capacity coming online;
- Acquisition of another domestic manufacturer or its manufacturing facility or facilities; or

Cover Letter: To expedite the review process, EPA recommends including a cover letter with this report that specifies:

- The total amount of allowances being requested for the following year.
- An explanation about why the request for additional allowances is being made.
- A description of the supporting documentation provided.
- 3) A pandemic or other public health emergency that increases the number of patients diagnosed with medical conditions treated by metered dose inhalers (MDIs).

To complete this section:

- Specify the applicable unique circumstance(s).
- Provide a projection of the *additional* monthly quantity, in kg, of each regulated HFC needed for use in the specified application in the following calendar year.
- Provide a detailed explanation to justify the additional need for application-specific allowances for each applicable unique circumstance.

Submitting Supporting Documentation

- Supporting documentation should be submitted to EPA through the HAWK module within e-GGRT.
- Supporting documentation should be uploaded into the system as part of your report submission.
- Refer to EPA's reporting instructions on <u>Submitting HFC Reports</u> for more information on the submission process.
- Submit, along with your report, documentation that supports this additional need. Supporting documentation should be documentation that can be verified and may include:
 - Copies of permits or other documents to clarify when the new line or facility is opening.
 - Agency communications and/or approval letters for new products or product modifications.
 - More recent sales numbers to document growth in MDI sales resulting from a public health emergency.
 - Purchase and sale agreements for facilities where a new product will be manufactured.
 - \circ $\;$ Recent invoices for equipment or capital tool purchases.
 - Other: Please check with EPA if you have other forms of documentation in mind.

Section 6 – Contracting Information

Completion of Section 6 is required only if (1) your company holds application-specific allowances for defense sprays, MDIs, or onboard aerospace fire suppression **and** (2) you contract out the manufacturing of defense sprays or MDIs or pay another person to perform the servicing of onboard aerospace fire suppression. If you meet these criteria, provide the following information:

- The name and contact information for the manufacturing or servicing company(ies).
- Clarify whether the data provided in this report correspond to the application-specific allowance holder or to the contracting company(ies) described in this section.

Section 7 – Quantity Acquired in Previous Three Years

Completion of Section 7 is required by all application-specific allowance holders submitting a July 2022 report (i.e., the January 1 - July 31, 2022 reporting period) **and** persons requesting application-specific allowances for the first time. You must provide this information if you are requesting application-specific allowances for calendar year 2023. To complete this section:

- Provide the quantity, in kg, of each regulated HFC acquired in the previous three years in 6month increments. Data for the most recent 6-month period will auto populate based on information entered in Section 2.
- Provide along with your report records documenting these quantities.
 - Records may include sales records or invoices.

- Specify the HFC weight per cylinder or unit if not included in the records provided.
- Ensure that the quantities contained in this section match the quantities in the supporting documentation you provide.

Post-Submission EPA Review Process

Once you have submitted your report, EPA may reach out with additional questions as the Agency reviews your information. This review and any subsequent follow-up may take time. If EPA does not have sufficient **Current Allowance Holders**: If you have already submitted invoices in the previous allocation cycle covering the period from July 1, 2019 – December 31, 2020, you do not need to resubmit these documents. However, you will need to submit invoices for the period covering January 1, 2021 – June 30, 2022.

documentation to verify your request, you may not receive allowances. *As such, we emphasize timely reporting and responses to follow-up to ensure your company can be considered for allowances.*

Some of the follow-up may involve EPA requesting:

- Additional information on any discrepancies between your reported data and documentation provided to support this data, such as quantity of HFCs acquired.
- Additional information on unique circumstances, such as timeframe or how the quantity of allowances requested is in addition to the allocation quantity EPA will calculate based on historic HFCs acquired data.
- Proper supporting documentation for unique circumstances, as outlined above in Section 5. This documentation may require review by your legal team or need redaction of confidential material.

EPA will request this information through the HAWK module within e-GGRT or by scheduling a meeting. Refer to EPA's reporting instructions on <u>Submitting HFC Reports</u> for more information on the resubmission process.