

Importers and Exporters of Fluorinated Greenhouse Gases Contained in Pre-charged Equipment or Closed-Cell Foams

Subpart QQ, Greenhouse Gas Reporting Program

OVERVIEW

Subpart QQ of the Greenhouse Gas Reporting Program (GHGRP) (40 CFR 98.430 – 98.438) applies to importers and exporters of fluorinated greenhouse gases (GHGs) contained in pre-charged equipment or closed-cell foams that meet the Subpart QQ source category definition. Some subparts have thresholds that determine applicability for reporting, and some do not. To decide whether your facility must report under this Subpart, please refer to 40 CFR 98.431 and the GHGRP [Applicability Tool](#).

This Information Sheet is intended to help facilities reporting under Subpart QQ understand how the source category is defined, what GHGs must be reported, how GHG emissions must be calculated and shared with EPA, and where to find more information.



How is This Source Category Defined?

The Subpart QQ source category consists of importers and exporters of pre-charged equipment and closed-cell foams that contain fluorinated greenhouse gases (GHGs). Importers and exporters of pre-charged equipment and closed-cell foams that contain fluorinated GHGs must report if either their total imports or their total exports of fluorinated GHGs in equipment and foams is greater than or equal to 25,000 metric tons of carbon dioxide equivalent (CO₂e) per year (CO₂e/yr). This threshold is the same as that for bulk imports and exports of fluorinated GHGs in Subpart OO (Suppliers of Industrial GHGs), found at 40 CFR 98.410 – 98.418. Definitions for pre-charged equipment and closed-cell foam are provided below:

- **Pre-charged equipment:** Any appliance, appliance component, electrical equipment, or electrical equipment component that is charged with a fluorinated GHG prior to sale or distribution or offer for sale or distribution in interstate commerce. This definition includes both equipment that contains the full charge necessary for operation and equipment that contains a partial “holding” charge of the fluorinated GHG.
 - Appliances means any device that contains and uses a fluorinated GHG refrigerant and is used for household or commercial purposes, such as air conditioners, motor vehicle air conditioners, refrigerators, chillers, and freezers.
 - Electrical equipment includes (but is not limited to) gas-insulated substations, circuit breakers, other switchgear, gas-insulated lines, and power transformers.
- **Closed-cell foam:** Any foam product, excluding packaging foam, that is constructed with a closed-cell structure and a blowing agent containing a fluorinated GHG. This definition includes (but is not limited to) polyurethane (PU) foam contained in equipment, PU continuous and discontinuous panel foam, PU one component foam, PU spray foam, extruded polystyrene (XPS) boardstock foam, and XPS sheet foam. Packaging foam means foam used exclusively during shipment or storage to temporarily enclose items.



What GHGs Must Be Reported?

Subpart QQ requires importers and exporters of fluorinated GHGs contained in pre-charged equipment or closed-cell foams to report the mass of each fluorinated GHG contained in the equipment or foam that is imported or exported during the calendar year. Fluorinated GHGs include hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF₆), and other gases as defined by the Greenhouse Gas Reporting Program (GHGRP) rule. In general, pre-charged appliances contain HFC refrigerants (and in some cases, HFC blowing agents in insulating closed-cell foams); pre-charged electrical equipment contains SF₆ or PFCs; and closed-cell foams contain HFC blowing agents. However, if a particular piece of imported or exported equipment or foam contained another fluorinated GHG, the importer or exporter are required to report that fluorinated GHG.

If multiple GHGRP source categories are co-located at a facility, the facility may need to report GHG emissions under a different subpart. Please refer to the relevant information sheet for a summary of the rule requirements for any other source categories located at the facility.



How Must GHG Emissions Be Calculated?

Importers and exporters determine the total mass of fluorinated GHG imported or exported in their equipment or closed-cell foams as follows:

- For each type of equipment containing a fluorinated GHG used as a refrigerant or electrical insulator, multiply the fluorinated GHG charge per unit of equipment by the number of units of equipment imported or exported annually.
- For each type of equipment with closed-cell foam that contains a fluorinated GHG, multiply the mass of fluorinated GHG in the closed-cell foam in each unit of equipment by the number of units of equipment imported or exported annually.
- For each type of closed-cell foam containing a fluorinated GHG that is imported or exported in bulk, multiply the fluorinated GHG charge per cubic foot (cu ft) of foam by the amount of foam in cu ft imported or exported annually.

A checklist for data that must be monitored is available here: [Subpart QQ Monitoring Checklist](#).



What Information Must Be Reported?

In addition to the information required by the General Provisions in Subpart A, found at 40 CFR 98.3(c), the following must be reported:

- Total mass in metric tons of each fluorinated GHG imported or exported in pre-charged equipment or closed-cell foams.
- For each type of pre-charged equipment, the identity of the fluorinated GHG used as a refrigerant or electrical insulator, charge size (including holding charge, if applicable), and the number of pieces of equipment imported or exported.
- For closed-cell foams imported or exported inside of equipment, for each equipment type, the identity of the fluorinated GHG contained in the foam, the mass of fluorinated GHG contained in the foam in each piece of equipment, and the number of pieces of equipment imported or exported.
- For closed-cell foams not imported or exported inside of equipment, for each foam type, the identity of the fluorinated GHG contained in the foam, the density of the fluorinated GHG in the foam, and the volume of foam imported or exported.

- If the identity and mass of the fluorinated GHG within the closed-cell foam is unknown, for each foam type, the name of the foam manufacturer and certification that the importer or exporter was unable to obtain information on the identity and mass of the fluorinated GHG.
- The Harmonized tariff system (HTS) code for each type of pre-charged equipment or closed-cell foam imported.
- The Schedule B code for each type of pre-charged equipment or closed-cell foam exported.



What Records Must Be Maintained?

Reporters are required to retain records that pertain to their annual GHGRP report for at least three years after the date the report is submitted. Please see the [Subpart A Information Sheet](#) and 40 CFR 98.3(g) for general recordkeeping requirements. Specific recordkeeping requirements for Subpart QQ are listed at 40 CFR 98.437.



When and How Must Reports Be Submitted?

Reporters must submit their annual GHGRP reports for the previous calendar year to the EPA by March 31st, unless the 31st falls on a Saturday, Sunday, or federal holiday, in which case reports are due on the next business day. Annual reports must be submitted electronically using the [electronic Greenhouse Gas Reporting Tool \(e-GGRT\)](#), the GHGRP's online reporting system.

Additional information on setting up user accounts, registering a facility, and submitting annual reports is available on the [GHGRP Help webpage](#).



When Can a Facility Stop Reporting?

A facility may discontinue reporting under several scenarios, which are summarized in Subpart A (found at 40 CFR 98.2(i)) and the [Subpart A Information Sheet](#).



For More Information

For additional information on Subpart QQ, please visit the [Subpart QQ webpage](#). For additional information on the GHGRP, please visit the [GHGRP website](#), which includes additional information sheets, [data](#) previously reported to the GHGRP, [training materials](#), and links to Frequently Asked Questions ([FAQs](#)). For questions that cannot be answered through the GHGRP website, please contact us at: GHGReporting@epa.gov.

This Information Sheet is provided solely for informational purposes. It does not replace the need to read and comply with the regulatory text contained in the rule. Rather, it is intended to help reporting facilities and suppliers understand key provisions of the GHGRP. It does not provide legal advice; have a legally binding effect; or expressly or implicitly create, expand, or limit any legal rights, obligations, responsibilities, expectations, or benefits with regard to any person or entity.