

HFC Reclaimers and Fire Suppressant Recyclers

HFC Allocation Rule Reporting February 2021

Agenda



- HFC Allocation Rule Background
- HFC Reporting Requirements
- Reporting Process Overview
- HFC Reporting System Registration
- Account Management
- Submitting an HFC Report
- Resources
- Questions

HFC Allocation Rule Background



- The American Innovation and Manufacturing (AIM) Act of 2020
 - Enacted on December 27, 2020
 - Phases down HFC production and consumption by 85 percent by 2036
- The HFC Allocation Final Rule
 - Published in the Federal Register on October 5, 2021 (86 FR 55116)
 - Establishes an HFC allowance allocation and trading system to phase down HFCs consistent with the AIM Act

| Date | Caps: Consumption & Production |
|--------------|--------------------------------|
| 2022–2023 | 90 percent |
| 2024–2028 | 60 percent |
| 2029–2033 | 30 percent |
| 2034–2035 | 20 percent |
| 2036 & after | 15 percent |

HFC Allocation Rule Background



- Establishes new reporting and recordkeeping requirements for HFC reclaimers and fire suppressant recyclers under 40 CFR part 84
- Reporting requirements are similar to the reporting requirements for HCFCs and other ozone depleting substances (ODS) under 40 CFR Part 82
 - See https://www.epa.gov/section608/stationary-refrigeration-refrigerant-reclamation-requirements for more information on existing refrigeration reclamation requirements
- The HFC Allocation Rule does not replace existing requirements for refrigerant reclaimers under 40 CFR Part 82

HFC Reporting Requirements



- Reporting for reclaimers and recyclers
 - Reclaimer One-Time Report: Submission of a report due February 14, 2022, detailing the quantity of each regulated substance held in inventory as of December 31, 2021 and information on batch testing.
 - Quarterly Reporting: Submission of a report within 45 days of the end of each quarter detailing the quantity of HFCs received for reclamation/recycling during the quarter. In the 4th quarter only, include the quantity of each regulated substance held in inventory as of December 31.
- Reports must be submitted to EPA through the HFC Reporting System within the electronic Greenhouse Gas Reporting Tool (e-GGRT)



Reclaimer One-Time Report



Section 1 - Company Identification

Instructions: Complete the following company information.

| Company Name: | |
|---------------|--|
| Company ID: | |

Reporting Tip: Avoid cutting and pasting data into the reporting form. If you do cut and paste, paste data as a value into the form.

Section 2 - 2021 End-of-Year Inventory

Instructions: Provide the quantity of each HFC held in inventory on December 31, 2021.

| [| End-of-Year Inventory | | | | | |
|---|-----------------------|--------------------|--------------------|-----------------------------|-----------------------------|--|
| | 1 | 2 | 3 | 4 | 5 | |
| | | Quantity Recovered | Quantity Reclaimed | Quantity of Virgin Material | Total Quantity of Inventory | |
| - | HFC | (kg) | (kg) | (kg) | (kg) | |
| ١ | | §84.31(i)(1)(i) | §84.31(i)(1)(i) | §84.31(i)(1)(i) | §84.31(i)(1)(i) | |
| 1 | | - | _ | - | | |
| 2 | | | | | | |
| 3 | | | | | | |
| 4 | | | | | | |
| 5 | | | | | | |

Note that the form does not allow the reporting of mixed refrigerants. Companies should provide data on the quantity of each HFC held in inventory, including HFCs contained in mixed refrigerant.

Reclaimer One-Time Report



Section 3 - Laboratory Batch Testing Information

Instructions: Provide the following information on laboratory batch testing conducted during the prior year. For each laboratory identified, provide a signed statement from the laboratory confirming there is an ongoing business relationship with your company. Provide additional supporting documentation, as needed, to respond to these reporting requirements.

| | Batch Testing | | | | | | |
|---|-------------------------------------|--|--|--|--|--|--|
| | 1 | 2 | 3 | | | | |
| | Laboratory Name §84.31(i)(1)(ii) | Number of Batches Tested in Prior Year §84.31(i)(1)(iii) | Number of Batches that Did Not Meet the Specifications in Appendix A to 40 CFR part 82, Subpart F in the Prior Year §84.31(i)(1)(iv) | | | | |
| 1 | | | | | | | |
| 2 | | | | | | | |
| 3 | | | | | | | |
| 4 | | | | | | | |
| 5 | | | | | | | |
| 6 | | | | | | | |
| 7 | | | | | | | |
| 8 | | | | | | | |
| 9 | | | | | | | |
| 0 | | | | | | | |

Reclaimer Quarterly Report



Section 1 - Company Identification

Instructions: Complete the following company information.

| Company Name: | |
|--------------------|--|
| Company ID: | |
| Reporting Year: | |
| Reporting Quarter: | |

Instructions: Enter the quantity of each regulated substance that was received for reclamation during the quarter.

| HFC Reclamation | | | | | |
|-----------------|--|--|--|--|--|
| 1 | 2 | 3 | 4 | | |
| HFC | Quantity of Material Received for Reclamation (kg) §84.31(i)(2) | Quantity of Regulated Substance Reclaimed (kg) §84.31(j)(2) | Quantity of Waste Products (kg) §84.31(j)(2) | | |
| 1 | | | | | |
| 2 | | | | | |
| 3 | | | | | |
| 4 | | | | | |
| 5 | | | | | |
| 6 | | | | | |
| 7 | | | | | |
| 8 | | | | | |

Recycler Quarterly Report



Section 1 - Company Identification

Instructions: Complete the following company information.

| Company Name: | |
|--------------------|--|
| Company ID: | |
| Reporting Year: | |
| Reporting Quarter: | |

| Section 2 - Quarterly Recycling Information | | | | | | | |
|---|---|--|----------------------------|--|--|--|--|
| Instructions: Provide the fol | nstructions: Provide the following information for each regulated substance used as a fire suppressant received for recycling during the quarter. | | | | | | |
| | HFC Fire | Suppressant Recycling | | | | | |
| 1 | 2 | 3 | 4 | | | | |
| | Quantity of Material Received for Recycling | Quantity of Regulated Substance Recycled | Quantity of Waste Products | | | | |
| HFC | (kg) | (kg) | (kg) | | | | |
| | §84.31(j)(1) | §84.31(j)(1) | §84.31(j)(1) | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
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| | | | | | | | |

Annual Reporting



| Section 3 - End-of-Year Inventory | | | | | | | |
|-------------------------------------|--|---------------------------|-----------------------------|-----------------------------|--|--|--|
| Instructions: Provide the following | Instructions: Provide the following information for each HFC held in inventory as of December 31. Data should only be reported in the fourth quarter report. | | | | | | |
| | | HFC End-of-Year Inventory | | | | | |
| 1 | 2 | 3 | 4 | 5 | | | |
| | Quantity Recovered | Quantity Reclaimed | Quantity of Virgin Material | Total Quantity of Inventory | | | |
| HFC | (kg) | (kg) | (kg) | (kg) | | | |
| | §84.31(i)(3) | §84.31(i)(3) | §84.31(i)(3) | §84.31(i)(3) | | | |
| | | | | | | | |
| | | | | | | | |
| 3 | | | | | | | |
| | | | | | | | |
| 5 | | | | | | | |
| 6 | | | | | | | |
| 7 | | | | | | | |
| | | | | | | | |
| | | | | | | | |

Reporting Process Overview



Step 1 – Register with the HFC reporting system (one-time step)*

Step 2 – Fill out the applicable reporting form

Step 3 – Submit the report along with any supplemental files to EPA via the HFC reporting system

Step 4 – Revise submission, as needed, via the HFC reporting system Step 5 – Receive outcome documentation from EPA via the HFC reporting system

EPA Reviews Submission EPA Reviews Resubmission (if applicable)

^{*} Companies register with e-GGRT prior to registering with the HFC reporting system.



- Even if already registered in e-GGRT, entities who report under the 40 CFR part 84 must provide the following information to EPA to receive a unique registration invitation:
 - Company Name Companies that are majority owned and/or controlled by the same individual(s) must report to EPA under a single company name
 - Corporate Address
 - Company Representative Name The designated officer that will serve as the entity's main point of contact for all HFC reporting under the HFC allocation program
 - Company Representative Email
 - Company Representative Phone



Invitation Code e-mail

- You will receive an e-mail from eGGRT@ccdsupport.com
- The e-mail contains an invitation code
- Make sure emails from <u>eGGRT@ccdsupport.com</u> are not sent to your spam/junk folder

The HFC Reporting System is a new application that is currently under development. Therefore, many of the screenshots provided in this presentation are subject to change as text is finalized and more functionality in the system is implemented and refined.



HFC Reporting: Accept appointment as Company Representative for MLH Resources

POTEMKIN,GEORG

A notice from EPA's electronic Greenhouse Gas Reporting Tool (e-GGRT)regarding HFC reporting under the AIM Act.

Your Invitation Code ADV-JD6

EPA has identified you as the Company Representative for: MLH Resources Ode Tine, Washington 92043 United States of America

*** Below are instructions for accessing the HFC reporting module within the e-GGRT system. ***

If you are not a current e-GGRT user, you will first need to create a user account. To create an e-GGRT user account, go to https://ghgreporting.epa.com and click the "Create your e-GGRT account" link on the login page. Note that you will need to sign an electronic signature agreement (ESA) prior to completing the new user registration process. Processing of paper ESAs can take up to 7 days, so you are encouraged to begin the process of registering a new account immediately upon receipt of this e-mail.

Once you are a registered e-GGRT user, follow these steps to accept this appointment:

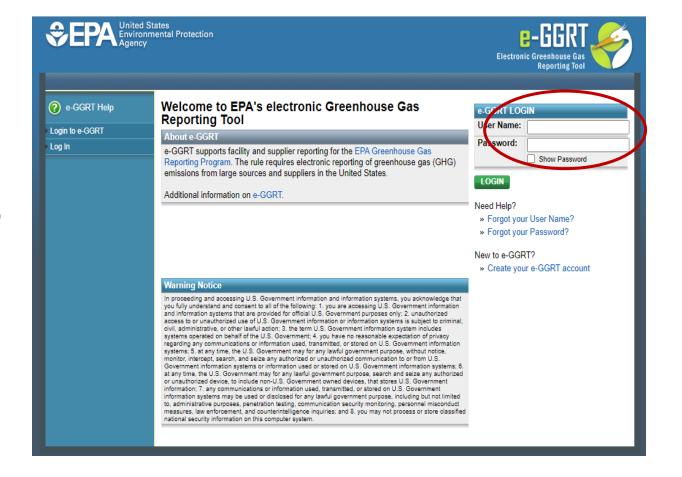
- 1) Login to e-GGRT at https://ghgreporting.epa.com
- 2) On the homepage, find the "Accept an Appointment" panel, then copy and paste the Invitation Code provided above in the field provided.
- 3) Click the Go button to open the Accept Assignment screens.
- 4) Follow the instructions on the screen to complete the acceptance process.

If you believe you received this message in error, or have questions, please contact the HFC Allocation Rule Reporting Help Desk at https://www.epa.gov/climate-hfcs-reduction/forms/hfc-allocation-rule-reporting-helpdesk.



Log into e-GGRT

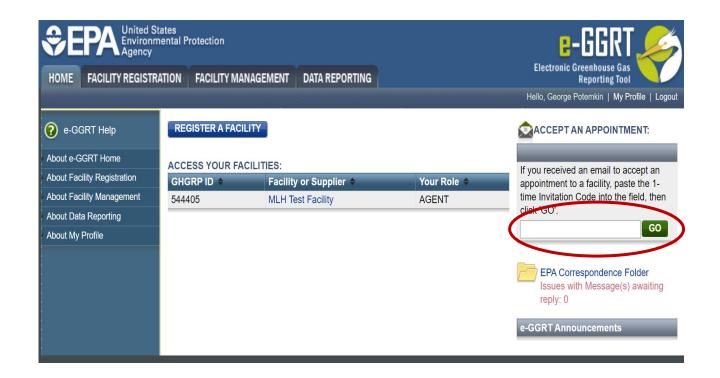
- Visit https://ghgreporting.epa.gov
- Enter your Username and Password
- If you haven't used your e-GGRT account for 90 days, you will have to update your password
- If you don't already have an e-GGRT account, visit https://ccdsupport.com/confluence/display/help/Basic+User+Registration





Accept an Appointment

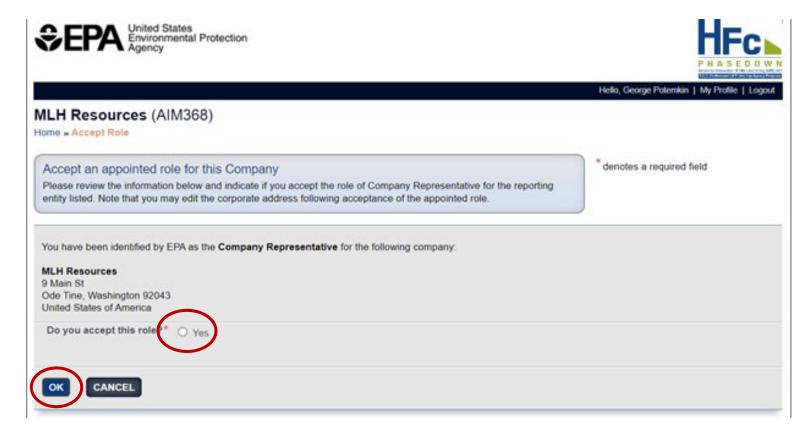
- An invitation code can be used by any e-GGRT user (not just the email recipient)
- The invitation code can only be used once
- Copy and paste the invitation code into the "Accept an Appointment" panel
- Click "Go"





Accept the Role

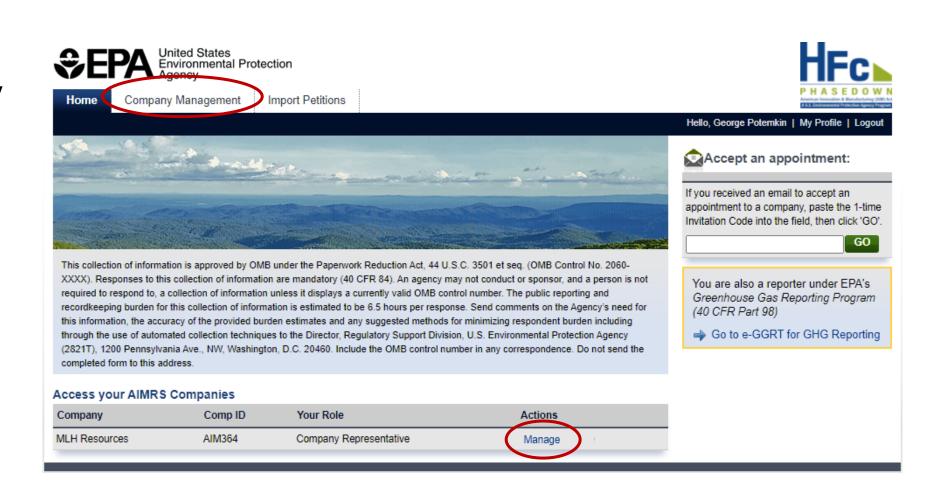
- View the name and address of the company
- You may edit the corporate address following acceptance of the appointed role
- Select the "Yes" radio button and click "OK"



If you are not the Company Representative for the company listed, select 'Cancel' and either (1) forward the invitation code to the correct person that will serve as the Company Representative or (2) contact the <u>EPA HFC Allocation Rule Reporting Help Desk</u>.

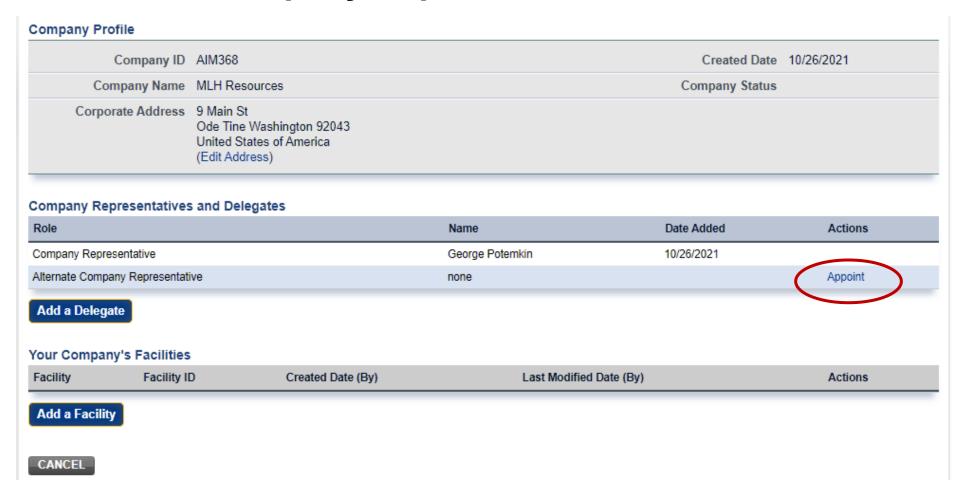


- Appoint an alternate company representative
- Reassign the company representative
- Appoint delegates
- Edit company address
- Add a new facility





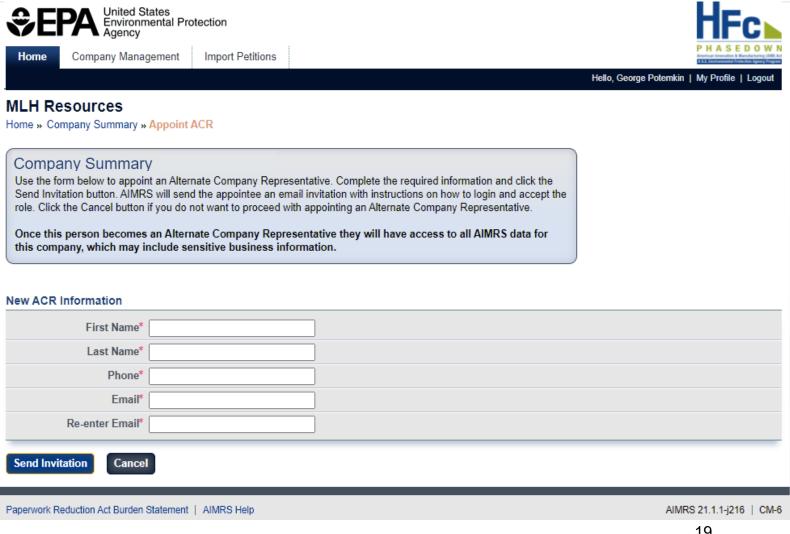
Appoint Alternate Company Representative





Appoint an ACR

- Enter ACR nominee's name, phone, and e-mail
- They will receive an e-mail from eGGRT@ccdsupport.com with an invitation code
- They must log into e-GGRT and paste the nomination code into "Accept an Appointment" panel
- After accepting the nomination, the ACR gains access all company data
- ACR has the same data access. and reporting rights as the CR





Reassign a CR or ACR

Company Profile

| Company ID | AIM368 | Created Date 10/26/2021 |
|-------------------|--|-------------------------|
| Company Name | MLH Resources | Company Status |
| Corporate Address | 9 Main St Ode Tine Washington 92043 United States of America (Edit Address) | |

Company Representatives and Delegates

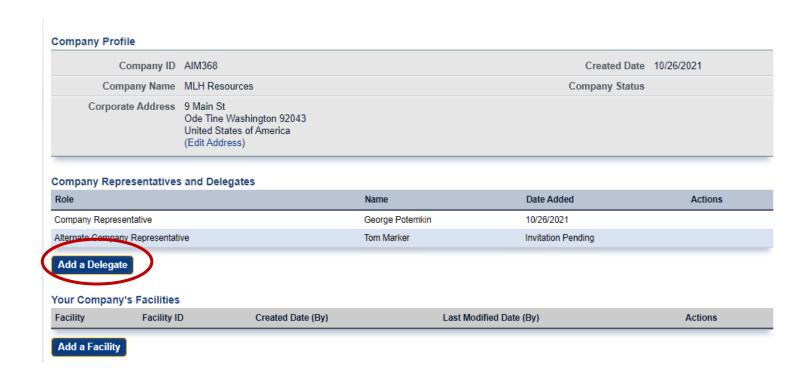
| Role | Name | Date Added | Actions | |
|----------------------------------|-----------------|---------------|-----------------------------|--|
| Company Representative | George Potemkin | 10/26/2021 No | minate New CR - Coming Soon | |
| Alternate Company Representative | Tom Marker | 11/04/2021 | Remove | |

Add a Delegate



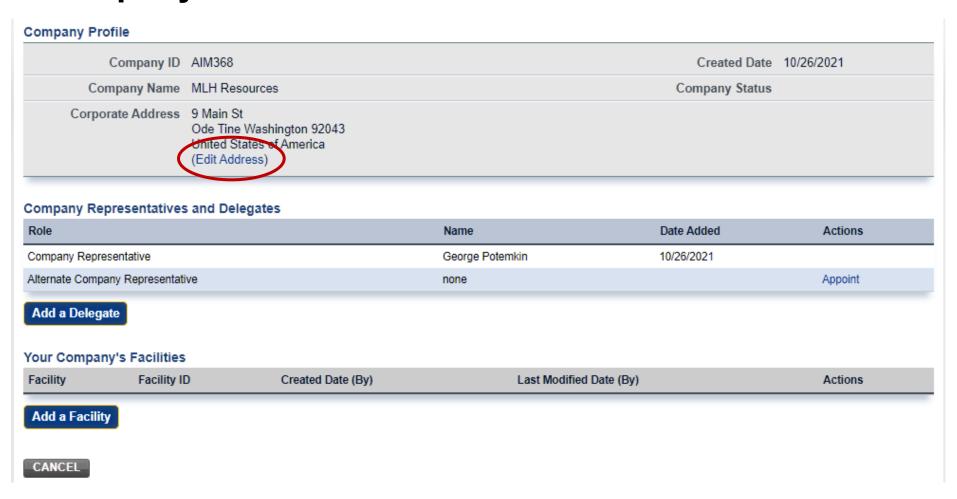
Appoint a Delegate

- There is no limit on the number of Delegates a company can appoint
- Enter Delegate nominee's name, phone, and e-mail
- They will receive an e-mail from <u>eGGRT@ccdsupport.com</u> with an invitation code
- They must log into e-GGRT and paste the nomination code into "Accept an Appointment" panel
- After accepting the nomination, the Delegate gains access to all company data
- A Delegate has the same data access and reporting rights as the CR and ACR





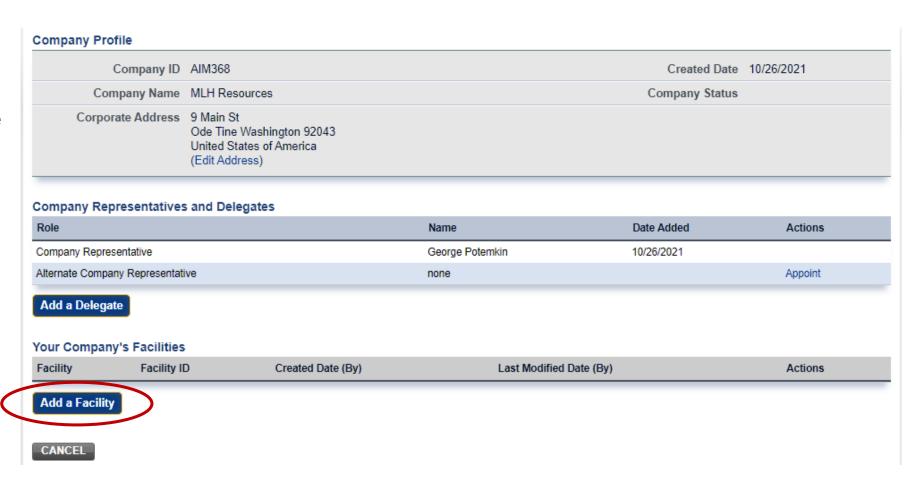
Edit the Company Address





Add a Facility

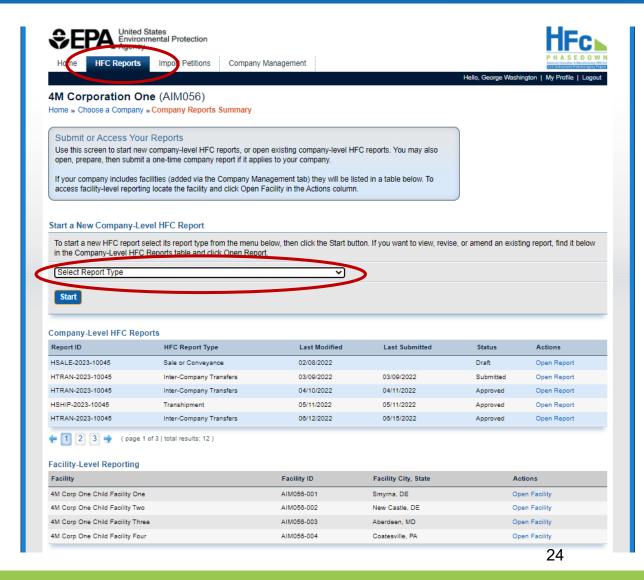
- Certain HFC activities are reported to EPA at the facility-level, not the company-level
- Facility-level information is not required for reporting on reclamation or recycling
- Additional information on the Add a Facility feature is coming soon



Submitting a New Report



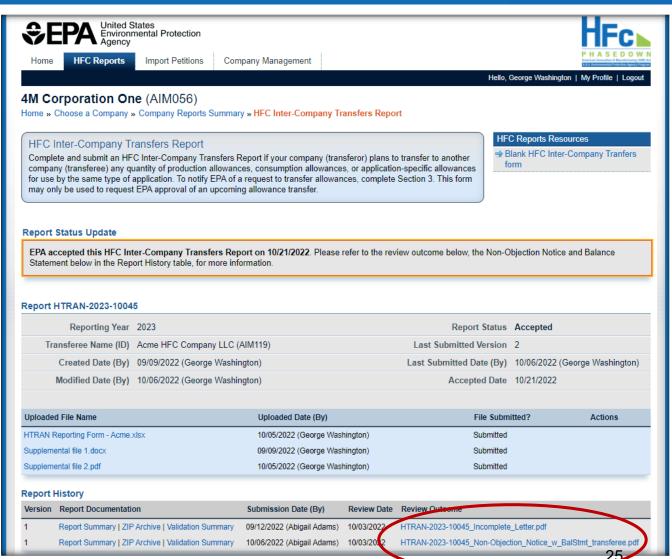
- 1. Log into e-GGRT
- 2. Enter the HFC Reporting System
- 3. Navigate to the HFC Reports tab
- Upload a Completed Excel-based Reporting Form
- Address Validation Errors, if Applicable
- Upload Supporting Documentation, as Needed
- 7. Submit Report
- 8. Complete Electronic Signature
- 9. Receive Confirmation Email



Viewing Submission Documents



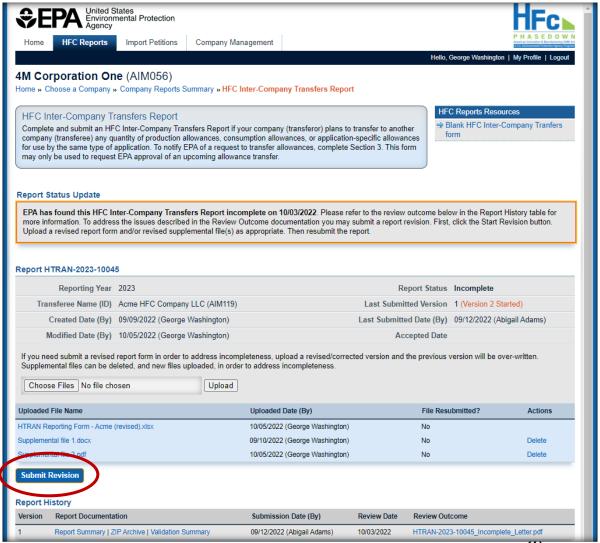
- Receive status update notification
- 2. Log into e-GGRT and enter the HFC Reporting System
- 3. Locate and open the previously submitted report
- 4. Open Review Outcome files



Resubmitting a Report



- 1. Receive status update notification
- Log into e-GGRT and enter the HFC Reporting System
- 3. Locate and open the previously submitted report
- 4. View incomplete letter or error report, if applicable
- 5. Start revision
- 6. Revise report
- 7. Resubmit report
- 8. Receive confirmation email



Resources



- HFC Allocation Final Rule (https://www.epa.gov/climate-hfcs-reduction/final-rule-phasedown-hydrofluorocarbons-establishing-allowance-allocation)
- HFC Allocation Program Reporting and Recordkeeping web page (https://www.epa.gov/climate-hfcs-reduction/hfc-allocation-rule-reporting-and-recordkeeping)
 - Reporting Forms
- HFC Allocation Rule Reporting Resources

(https://www.epa.gov/climate-hfcs-reduction/hfc-allocation-rule-reporting-resources)

- Webinar Presentation Slides
- Reporting Instructions
- EPA's electronic Greenhouse Gas Reporting Tool (e-GGRT) (https://ghgreporting.epa.gov/)
- HFC Allocation Rule Reporting Help Desk (https://www.epa.gov/climate-hfcs-reduction/forms/hfc-allocation-rule-reporting-helpdesk)

This presentation will be posted to EPA's Reporting and Recordkeeping website



Questions?