Petitioning EPA to Import HFCs for Transformation or Destruction

HFC Allocation Rule Reporting
November 18, 2021
Agenda

- HFC Allocation Rule Background
- Reporting Requirements
- Reporting Process Overview
- HFC Reporting System Registration
- Account Management
- Import Petition Reporting
- Helpful Resources
- Questions
The American Innovation and Manufacturing (AIM) Act of 2020
- Enacted on December 27, 2020
- Phases down production and consumption of HFCs by 85 percent by 2036

The HFC Allocation Final Rule
- Published October 5, 2021
- Establishes an HFC allowance allocation and trading system to phase down HFCs consistent with the AIM Act
- Starting January 1, 2022, allowances are needed to produce or import bulk HFCs, with certain exceptions (including imports of virgin HFCs intended for transformation or destruction)
Reporting Requirements

- Companies that produce, import, export, destroy, use as a feedstock, reclaim, recycle for fire suppression uses, package, or otherwise distribute HFCs are subject to the reporting requirements codified in 40 CFR part 84.

- 84.25(a)(1) Petition to import regulated substances for use in a process resulting in transformation or destruction
  - A person must petition EPA for the import of each individual shipment of a regulated substance imported for use in a process resulting in transformation or destruction in order to not expend allowances.
  - Required at least 30 days before the shipment is to arrive at a U.S. port.
  - A person importing *used* material for disposal by destruction is subject to similar but slightly different reporting requirements, per 84.25(b)(1).
Reporting Process Overview

**Step 1** - Register with the HFC Reporting System (one-time step)

**Step 2** - Complete the Petition to Import HFCs for Transformation or Destruction Reporting Form

**Step 3** - Submit the report along with any supplemental files to EPA via the HFC Reporting System

**Step 4** – Revise and/or amend submission, as needed, via the HFC Reporting System

**Step 5** - Receive Non-Objection Notice from EPA via the HFC Reporting System
HFC Reporting System Registration

- Registration is by invitation only
- Affected entities must provide the following information to EPA to receive an 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**
HFC Reporting System Registration

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 eGGRT@ccdsupport.com 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 System Registration

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 EPA HFC Allocation Rule Reporting Help Desk.
Company Management

- Appoint an alternate company representative
- Reassign the company representative
- Appoint delegates
- Edit company address
- Add a new facility
Appoint Alternate Company Representative
Company Management

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
Company Management

Reassign a CR or ACR

Company Profile

<table>
<thead>
<tr>
<th>Company ID</th>
<th>AIM368</th>
<th>Created Date</th>
<th>10/26/2021</th>
</tr>
</thead>
<tbody>
<tr>
<td>Company Name</td>
<td>MLH Resources</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Corporate Address</td>
<td>9 Main St</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Ode Tine Washington 92043</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>United States of America</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>(Edit Address)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Company Representatives and Delegates

<table>
<thead>
<tr>
<th>Role</th>
<th>Name</th>
<th>Date Added</th>
<th>Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Company Representative</td>
<td>George Polenkin</td>
<td>10/26/2021</td>
<td><img src="https://example.com/nominate" alt="Nominate New CR - Coming Soon" /></td>
</tr>
<tr>
<td>Alternate Company Representative</td>
<td>Tom Marker</td>
<td>11/04/2021</td>
<td><img src="https://example.com/remove" alt="Remove" /></td>
</tr>
</tbody>
</table>

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 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 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

### Company Profile

<table>
<thead>
<tr>
<th>Company ID</th>
<th>Created Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>ATM368</td>
<td>10/25/2021</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Company Name</th>
<th>Corporate Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>MLH Resources</td>
<td>9 Main St, Ole Tim Washington 92043, United States of America</td>
</tr>
</tbody>
</table>

*(Edit Address)*

### Company Representatives and Delegates

<table>
<thead>
<tr>
<th>Role</th>
<th>Name</th>
<th>Date Added</th>
<th>Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Company Representative</td>
<td>George Potemkin</td>
<td>10/26/2021</td>
<td>Appoint</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Your Company’s Facilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Facility</td>
</tr>
<tr>
<td>Add a Facility</td>
</tr>
</tbody>
</table>

CANCEL
Company Management

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 petitions to import HFCs
- Additional information on the Add a Facility feature is coming soon
Import Petition Reporting

- Petition to Import for Transformation or Destruction Reporting Form
  - Available for download on [EPA’s HFC Allocation Rule Reporting and Recordkeeping web page](#)

**Reporting Tip:** Avoid cutting and pasting data into the reporting form. If you do cut and paste data, paste data as a value into the form.
## Section 3 - Shipment Information

Instructions: Provide the following information for each HFC contained in the shipment you are petitioning to import.

<table>
<thead>
<tr>
<th>Shipment Information</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

### Table: Shipment Information

<table>
<thead>
<tr>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
</tr>
</thead>
<tbody>
<tr>
<td>HFC to be imported</td>
<td>HTS Code</td>
<td>Quantity Imported</td>
<td>Unique Identification Number of Container</td>
<td>Container Capacity</td>
</tr>
</tbody>
</table>

## Section 4 - Transformation and Destruction Intermediary Information

Instructions: Provide the following information for each intermediary who will hold the material before the HFCs are transformed or destroyed, if applicable. If there is no intermediary, the table may be left blank.

<table>
<thead>
<tr>
<th>Intermediary Information</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

### Table: Intermediary Information

<table>
<thead>
<tr>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>6</th>
<th>7</th>
<th>8</th>
<th>9</th>
</tr>
</thead>
<tbody>
<tr>
<td>Company Name</td>
<td>Contact Name</td>
<td>Contact Phone</td>
<td>Contact Email</td>
<td>Street Address</td>
<td>City</td>
<td>State/U.S. Territory</td>
<td>Zip</td>
<td>Country</td>
</tr>
</tbody>
</table>

**Should the intermediary information be treated as confidential business information (CBI)?**

**Yes**

## Section 5 - Transformation and Destruction Facility Information

Instructions: Provide the following information for each facility where the imported HFCs will be transformed or destroyed. Those may be facilities owned or operated by the importer, or facilities owned and operated by other persons.

<table>
<thead>
<tr>
<th>T&amp;D Facility Information</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

### Table: T&D Facility Information

<table>
<thead>
<tr>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>6</th>
<th>7</th>
<th>8</th>
<th>9</th>
</tr>
</thead>
<tbody>
<tr>
<td>Company Name</td>
<td>Contact Name</td>
<td>Contact Phone</td>
<td>Contact Email</td>
<td>Facility Street Address</td>
<td>Facility City</td>
<td>Facility State/U.S. Territory</td>
<td>Facility Zip</td>
<td>Facility Country</td>
</tr>
</tbody>
</table>
Import Petition Reporting

- Submitting a New Petition
  1. Log into e-GGRT
  2. Enter the HFC Reporting System
  3. Navigate to the Import Petition tab
  4. Upload a Completed Import Petition Form
  5. Address Validation Errors, if Applicable
  6. Upload Export License Documentation and Other Supporting Documentation, as Needed
  7. Submit Report
  8. Complete Electronic Signature
  9. Receive Confirmation Email
Import Petition Reporting

Log into e-GGRT
Visit https://ghgreporting.epa.gov

Enter the HFC Reporting System
Navigate to the Import Petition tab and start a New Petition
Upload a Completed Import Petition Form

A blank reporting form is available for download from within the application and available on EPA’s web site: https://www.epa.gov/climate-hfcs-reduction/hfc-allocation-rule-reporting-and-recordkeeping
Import Petition Reporting

Address Validation Errors, if Applicable

Step 1: Upload a completed Import Petition form by clicking Choose File, locating the completed form on your computer, selecting the file, and clicking the Upload button. If validation errors are found, revise and upload the edited version of the form.

Step 2: Upload a copy of an English translation of the export license, application for an export license, or official communication acknowledging the export from the appropriate government agency in the country of export. You may upload as many supplemental files as necessary to satisfy this requirement.

Step 3: Click Submit to review and complete the electronic signature steps.
Import Petition Reporting

Upload Export License and Other Documentation, as Needed

• If a file is uploaded in error, delete by selecting **Delete** from the Actions menu

Submit Report

• You will have an opportunity to review your petition prior to completing the submission
Import Petition Reporting

Complete Electronic Signature

Receive Confirmation Email

Confirmation of HFC Report Submission (TDPET-2022-10013)

eGGRT@ccdsupport.com

The following report has been successfully submitted to EPA and is awaiting processing:

Company Name: AIM UAT ICF Company 9 (AIM809)
Report ID: TDPET-2022-10013
Version: 1
Form Alias: NA
Company Representative: Emily Golla
The petition was submitted by Emily Golla on 11/08/2022.
Import Petition Reporting

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

![Email notification](https://example.com/email.png)
Import Petition Reporting

Locate and Open Submission

Your AIMRS Import Petitions

Start a New Petition

- Company: AIM UAT ICF Company 9
- Comp ID: AIB009
- Your Role: Company Representative
- Actions: New Petition

View Review Outcome Documents

Petition ID: TDPET-2022-00013
- Alias: NA
- Company: AIM UAT ICF Company 9
- Created Date: 11/03/2021
- Last Modified Date: 11/08/2021
- Status: Submitted
- Actions: Open Petition

- Created Date: 11/08/2021
- Submitted Date: 11/08/2021
- Modified Date: 11/08/2021
- Accepted: NA

- Approval Date: 11/08/2021

This Petition has been submitted to EPA for review. At this time, the petition cannot be edited. Following a review you will be notified via email, at which time you can log into AIMRS, open the petition, and find more information about the review outcome.
Amending a Petition

1. Log into e-GGRT and enter the HFC Reporting System
2. Locate and open the previously submitted petition
3. Start amendment
4. Enter new/updated information
5. Submit amended petition
6. Receive confirmation email
Enter New/Updated Information

- Only select fields can be edited
  - Revise expected date of import
  - Provide previously unknown information
Import Petition Reporting

Complete Electronic Signature

Receive Confirmation Email

Confirmation of HFC Report Submission (TDPET-2022-10013)

eGGRT@cdcsupport.com

To: Golla, Emily; Jan, Shubh

Mon 11/8/2021 10:53:55 AM

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

The following report has been successfully submitted to EPA and is awaiting processing:

Company Name: AIM UAT ICF Company 9 (AIM/809)
Report ID: TDPET-2022-10013
Version: 2
Form Alias: NA
Company Representative: Emily Golla
The petition was submitted by Emily Golla on 11/08/2022
Resubmitting a Petition

1. Receive status update notification
2. Log into e-GGRT and enter the HFC Reporting System
3. Locate and open the previously submitted petition
4. View incomplete letter
5. Start revision
6. Revise petition
7. Resubmit petition
8. Receive confirmation email
View incomplete letter
• The letter will specify the reason the petition was identified as incomplete

Start revision
• Selection of the Start Revision button is required to modify submission files
Import Petition Reporting

Revising Petition
- Upload modified Excel-report
- Delete and/or add new supporting documents

Resubmit Petition
- Select Submit Petition
- Complete electronic signature
**Import Petition Reporting**

**Petition Status and History**

**Receive Confirmation Email**

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**Confirmation of HFC Report Submission (TDPET-2022-10023)**

- **eGGRT@ccdsupport.com**
- **Mon 11/6/2021 10:55 AM**

*(Message content)*

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

The following report has been successfully submitted to EPA and is awaiting processing:

- **Company Name:** 4M Corporation One (AIM056)
- **Report ID:** TDPET-2022-10023
- **Version:** 2
- **FormAlias:** 2022C3B
- **Company Representative:** Emily Golla

The petition was submitted by Emily Golla on 09/23/2022
Helpful Resources

- HFC Allocation Final Rule

- HFC Allocation Program Reporting and Recordkeeping web page
  - Reporting Forms
  - Webinar Recordings and Presentation Slides (coming soon)
  - Reporting Instructions (coming soon)

- EPA’s electronic Greenhouse Gas Reporting Tool (e-GGRT)
  (https://ghgreporting.epa.gov/ghg/login.do)

- 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?