



# Completing the HFC Application-Specific Allowance Holder Biannual Report

*HFC Allocation Rule Reporting Instructions  
July 2025*

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## INTRODUCTION

This document describes each data element in the HFC Application-Specific Allowance Holder Biannual Report and provides step-by-step instructions 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 [Registration and Account Management](#) for more information on the registration process. If you have any questions on how to fill out your report, please email [HFCAallocation@epa.gov](mailto:HFCAallocation@epa.gov). The remainder of this document is organized as follows:

- [Reporting Schedule](#)
- [Tab #1: Company Information](#)
  - [Section 1 – Company Identification](#)
  - [Section 2 – Application-Specific Data](#)
  - [Section 3 – Allowance Conferral Data](#)
- [Tab #2: Next Year Allowances](#)
  - [Section 4 – Transition Plan](#)
  - [Section 5 – Additional Application-Specific Allowances for Next Year](#)
  - [Section 6 – Contracting Information](#)
  - [Section 7 – Quantity Acquired in Previous Three Years](#)
  - [Section 8 – Applicant Information](#)
  - [Section 9 – Total Expected HFC Purchases for the Next Calendar Year](#)

## REPORTING SCHEDULE

The HFC Application-Specific Allowance Holder Biannual Report is due twice per year. The first report covering January 1 – June 30 is due July 31, and the second report covering July 1 – December 31 is due January 31 of the following year.

Reporting Period Covered	Due Date	Form Application and Requirements
January 1 – June 30	<b>July 31<sup>st</sup></b>	<ul style="list-style-type: none"><li>• 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.</li><li>• Sections 1 – 8 must be completed.</li></ul>
July 1 – December 31	<b>January 31<sup>st</sup></b>	<ul style="list-style-type: none"><li>• Sections 1 – 3 must be completed.</li></ul>

## 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

**Who must complete:** All application-specific allowance holders **and** entities requesting application-specific allowances for the first time.

The following information must be provided:

- **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 [HFCAllocation@epa.gov](mailto:HFCAllocation@epa.gov).

### Section 2 – Application-Specific Data

**Who must complete:** All application-specific allowance holders **and** entities 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, in kilograms, 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, in kilograms, 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, in kilograms, during the 6-month reporting period without expending or conferring your allowances (i.e., from the open market). Buying HFCs on the open market means that you did not have to expend or confer allowances to obtain the HFCs as they may have: (1) been imported or produced with the supplier's allowances after January 1, 2022; (2) been imported or produced prior to 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, in kilograms, held on the last day of the previous 6-month period (i.e., December 31 or June 30) in inventory in the United States by your company or held under contract by another company for your use. If there is an increase in inventory from the previous reporting period, the increase should not exceed the quantity of acquired HFCs as reported in the three previous fields.
- **Quantity Destroyed:** The amount of each regulated HFC, in kilograms, your company [destroyed](#) during the 6-month reporting period.
- **Quantity Recycled:** The amount of each regulated HFC, in kilograms, your company recycled during the 6-month reporting period.

Please ensure that the date used for reporting quantities acquired aligns with the date that this material is reported as held in inventory. For example, if your company reports quantities acquired based on the date when the material is received on-site, please use the same date to report when the material is held in inventory. This alignment helps avoid discrepancies in which a company appears to have grown inventory without acquiring HFCs.

**Supporting documentation is required** for the quantities of HFCs acquired. Examples of supporting documentation include invoices, purchase orders, or shipping documentation. Please ensure you are using the same supporting documentation and dates for the quantities of HFCs acquired year-to-year.

**Supporting documentation is also required** for quantities of HFCs held in inventory. Examples of supporting documentation include a spreadsheet or screenshot of this quantity from your company's tracking system or a document that certifies that this quantity is correct, as well as a description of how this quantity is calculated.

### Section 3 – Allowance Conferral Data

**Who must complete:** Any entity that conferred application-specific allowances or acquired material through the conferral of allowances during the 6-month 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 of each regulated HFC received.

Some companies may confer allowances in a different reporting period than which they received HFCs from those conferred allowances. It is permissible if the “Quantity of Allowances Conferred” in Section 3 do not correspond directly with the “Quantity Acquired through Conferring Allowances” in Section 2 over a given time period. If material was acquired through allowances that were conferred during the **prior reporting year**, then the “Quantity of Allowances Conferred” in Section 3 for that material may be zero. However, if material is reported as “Acquired through Conferring Allowances” in Section 2, that amount for each HFC acquired should equal the total of all “Quantity of HFC Received” in Section 3.

## TAB #2: NEXT YEAR ALLOWANCES

Only complete Tab #2 when submitting the HFC Application-Specific Allowance Holder Biannual Report due July 31. Do not complete the sections in this tab in the report due January 31.

### Section 4 – Transition Plan

**Who must complete:** All application-specific allowance holders *and* entities requesting application-specific allowances for the first time.

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.

**As information submitted under this report is required to be accurate and complete, please update this section yearly to reflect the most recent developments in your transition.**

### Section 5 – Additional Application-Specific Allowances for Next Year

**Who must complete:** Entities that are requesting allowances *in addition to* what the Agency will calculate based on HFC usage during the previous three years (as reported under Section 2 and Section 7). This is not your companies total request, which is to be completed in Section 9.

**Additional allowances may only be requested due to one of the following unique circumstances, of which you can choose one or more:**

- 1) Demonstrated manufacturing capacity coming online;
- 2) Acquisition of another domestic manufacturer or its manufacturing facility or facilities; or
- 3) A pandemic or other public health emergency that increases the number of patients diagnosed with medical conditions treated by metered dose inhalers (MDIs).

EPA proposed additional unique circumstances in its proposed rule, [Review and Renewal of Eligibility for Application-Specific Allowances, 89 FR 75898](#) (proposed September 16, 2024) (to

be codified at 40 CFR Part 84), but at the time of the publication of this document, has not finalized this rule.

To complete this section:

- Specify the applicable unique circumstance(s).
- Provide a projection of the **additional** monthly quantity, in kilograms, 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.
  - If you are submitting for the same unique circumstance that you have requested additional allowances for in previous years, please provide an update on progress and an explanation on why this unique circumstance is still relevant.
- Submit documentation that supports this additional need. Any supporting documents submitted to EPA will be treated as CBI. Supporting documentation should be verifiable and may include:
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  - 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.
  - Recent invoices for equipment or capital tool purchases.
  - Securities and Exchange Commission filings documenting facility acquisitions or expansions.
  - Other: Please check with EPA if you have other forms of documentation in mind.
- Some forms of documentation may provide helpful context but are not sufficient to substantiate a unique circumstance request on their own. Examples of insufficient documentation include:
  - Projected demand numbers
  - Press releases

**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 due to a unique circumstance is being made.
- A description of the supporting documentation provided.

## Section 6 – Contracting Information

**Who must complete:** (1) Entities who both hold application-specific allowances for defense sprays, MDIs, or onboard aerospace fire suppression **and** (2) 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

**Who must complete:** Entities that are requesting application-specific allowances for the first time (i.e., you are requesting application-specific allowances for the next calendar year).

To complete this section:

- Provide the quantity, in kilograms, of each regulated HFC acquired in the previous three years in 6-month increments. Data for the most recent 6-month period will auto-populate based on information entered in Section 2.
- Provide 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.

## Section 8 – Application Information

**Who must complete:** Entities requesting application-specific allowances for the first time.

An entity requesting application-specific allowances for the first time must provide:

- A description of the use of regulated substances.
- A detailed explanation of how the use is an application-specific use listed in §84.13(a).

## Section 9 – Total Expected HFC Purchases for the Next Calendar Year

**Who must complete:** All entities submitting the HFC Application-Specific Allowance Holder Biannual Report due July 31 are encouraged to submit an estimate.

- Provide an estimate of the total quantity, in kilograms, of each HFC that your company expects to purchase next year. This should consider any additional needs under a potential unique circumstances request as well as your base allocation, determined from your HFC usage over the past three years.

## Post-Submission EPA Review Process

Once you have submitted your report, EPA may reach out with additional questions as the Agency reviews your information. The timeline for EPA to determine allowance allocations is relatively short, so ***timely reporting and responses to EPA's questions ensure your company can be considered for allowances.*** If EPA does not have sufficient documentation to verify your request, you may not receive allowances.

Examples of 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 HFC usage data.
- Proper supporting documentation for unique circumstances, as outlined above in Section 5.

EPA will request this information through the HAWK module within e-GGRT or by scheduling a meeting. Refer to EPA's reporting instructions on [Submitting HFC Reports](#) for more information on the resubmission process.