



## OFFICE OF AIR AND RADIATION

WASHINGTON, D.C. 20460

September 23, 2025

TRANSMITTED VIA EMAIL  
RETURN RECEIPT REQUESTED

Mr. Tim Brown  
Founder & Chief Executive Officer  
Tradewater, LLC  
1550 W Carroll Avenue  
Chicago, Illinois 60607

Dear Mr. Brown,

In light of concerns about the continuing need for halons, especially Halon-1301, for use as a fire suppression agent, particularly in aviation and other enduring uses, the U.S. Environmental Protection Agency (EPA) is evaluating the destruction of halons that can be reprocessed, including destruction under carbon credit and offset programs. Pursuant to Clean Air Act (CAA) Section 114(a), 42 U.S.C. § 7414(a), the EPA is requiring Tradewater, LLC (“Tradewater,” “the company,” or “you”) to submit information.

Halons are class I ozone-depleting substances regulated under CAA Title VI. EPA regulations at 40 C.F.R. Part 82, Subparts A, G, and H establish requirements for the production, import, export, destruction, and use of halons.

Section 114(a) authorizes the Administrator of the EPA to require any person whom the Administrator believes may have information necessary for the purposes set forth in Section 114(a), or who is subject to any requirement of the CAA, to provide such information as the Administrator may reasonably require for the purpose of carrying out any provision of the CAA. Therefore, in accordance with Section 114(a)(1), providing this information is mandatory.

Within 21 days of receipt of this information request letter, Tradewater must provide the information requested in the enclosure to this letter. Please provide responses in electronic format through the EPA’s Central Data Exchange (CDX). Instructions on how to submit the information securely through CDX can be found here: <https://www.epa.gov/ods-phaseout/submitting-other-documents-epa>.

Tradewater must submit all required information accompanied by the following certification, signed and dated by a responsible official of Tradewater:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1519.

Be aware that if Tradewater does not provide the information requested in a timely manner, the EPA may order you to comply and may assess monetary penalties under Section 113 of the CAA, 42 U.S.C. § 7413. Federal law establishes criminal penalties for providing false information to the EPA. This letter is not subject to Office of Management and Budget review pursuant to the Paperwork Reduction Act, 44 U.S.C. Chapter 35.

You may assert a business confidentiality claim covering part or all of the information requested in the manner described by 40 C.F.R. § 2.203(b). Information covered by such a claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in 40 C.F.R. Part 2, Subpart B. Note that certain categories of information, such as emission data, are not properly the subject of such a claim. If no such claim accompanies the information when the EPA receives it, the EPA may make the information available to the public without further notice to you.

Please contact Cindy Newberg of the Stratospheric Protection Division at [Newberg.Cindy@epa.gov](mailto:Newberg.Cindy@epa.gov) or (202) 343-9729 if you have any questions regarding this letter.

Sincerely,



Aaron Szabo  
Assistant Administrator

Enclosure: Information to Send to EPA

## Enclosure

### Information to Send to EPA

Provide the following information to the EPA, printed in English. Such information shall pertain to Tradewater's efforts associated with Halon-1211 (CF<sub>2</sub>BrCl) and Halon-1301 (CF<sub>3</sub>Br) destruction projects.

1. How many halon destruction projects has your company submitted under the ACR or other registries for carbon credits?
2. Have you developed halon destruction projects under other registries, programs, or protocols?
3. How are the halons sourced, recovered, transported, and stored prior to destruction?
4. Is the material verified and/or tested in terms of its composition, purity, etc.? If so, how is the material verified and/or tested?
5. Can any or all of the material be reclaimed/recycled? If not, what would be the reason?
6. How is the destruction facility selected? Why choose to destroy halons outside of the United States?
7. List the companies you have worked with on halon destruction projects, including projects currently under development, and classify them based on what their role is in the project, including:
  - a. Destroying
  - b. Reclaiming/recycling
  - c. Recovering or sourcing supply
  - d. Conducting outside analysis to support or validate/verify the project
  - e. Other (please describe)
8. Provide the following information for each halon destruction project you have submitted for carbon credits, including:
  - a. Project ID
  - b. Project summary
  - c. Project name
  - d. Methodology the project was developed under
  - e. Types and quantities of halons destroyed
  - f. Date the project was initiated
  - g. Date the project was accepted and/or approved for credits (if applicable)
  - h. Date the project was rejected (if applicable)
  - i. Source(s) of halons and supporting documentation
  - j. Results from testing and verification of the material quality and composition (i.e., purity)
  - k. Location and name of the facility where the halons were destroyed
  - l. Date of destruction
  - m. Technology used or planned to be used to destroy the halons
  - n. Entity validating and/or verifying the project
  - o. Total number of credits issued or expected to be issued
  - p. Cost to facilitate the project broken out by type of expense (e.g., halon sourcing, logistics such as shipping/broker fees, storage, transport, destruction, validation/verification, etc.)

- q. Monetary payment received for the carbon credits associated with the project
  - r. Entities purchasing carbon credits associated with the project
  - s. Description of the steps taken to verify/validate all required elements of the project, including but not limited to, for example:
    - i) Compliance with all of the relevant requirements in section 2.1 of the ACR methodology, “Methodology for the Quantification, Monitoring, Reporting and Verification of Greenhouse Gas Emissions Reductions and Removals from the Destruction of Ozone Depleting Substances and High-GWP Foam” version 2.0 (February 2023), including all applicable monitoring and operational requirements as well as all other applicable federal, state, provincial, and local laws that apply directly to ozone-depleting substances (ODS) (e.g., Regulation (EU) 2024/590 prohibiting the destruction of halons unless the purity of the substance does not allow for its reclamation and subsequent re-use (see Article 20(4): [EU ODS regulation](#)), if destroyed in the European Union)
    - ii) Consistency of the sourcing of halons with section 2.2.4 of the ACR methodology, including that all halons originated from equipment or systems in the United States and Canada and that the halons were not in a strategic stockpile
  - t. All files submitted to the carbon registry
  - u. All records to document and verify the project, including any signed certifications
9. Provide documentation, including customs forms (bills of lading, invoices, official reports to U.S. Customs and Border Protection or the U.S. Census Bureau), for all halons exported or imported for halon destruction projects.
  10. Are you planning to import or export halons for destruction projects in the near term (i.e., in the next two years)? If so, where are you planning to import or export the material from/to?
  11. If your company has any halon destruction projects under development or planned in the next few years, provide the following information for each project:
    - a. Project summary
    - b. Methodology the project is being developed under
    - c. Date the project was initiated
    - d. Types and quantities of halons you are intending to destroy
    - e. Intended source(s) of halons and supporting documentation
    - f. Results of testing and verification of the material quality and composition (i.e., purity)
    - g. Location and name of the facility where the halons will be destroyed
    - h. Expected month and year of destruction
    - i. Expected month and year of export, if being destroyed abroad
    - j. Entity you intend to have validate and/or verify the project
    - k. Total number of carbon credits that you expect would be associated with the project
  12. Your company exported 30,000 lbs of Halon-1301 to France on or around July 10, 2025, with the intent of destroying the halons. Why did you choose to destroy halons outside of the United States? Is your company still planning to facilitate the destruction of this material for carbon credits? If yes, what is the location and name of the facility where the halons will be destroyed and what destruction technology is used at the facility? If being exported, what month and year are you planning to export the halons, from which country, and from which port?

13. EPA understands Tradewater has an additional 30,000 lbs of Halon-1301 that it acquired in the United States with the intent to destroy the material for carbon credits. Is your company still planning to facilitate the destruction of this material for carbon credits? If yes, what is the location and name of the facility where you intend to have the halons destroyed and what destruction technology is used at the facility? If being exported, what month and year are you planning to export the halons and from which U.S. port?

Include any claims of business confidentiality and reasons for requesting confidential treatment of the information. Mark information claimed as confidential with square brackets. Provide a public version of the information that redacts information you claim as confidential.