

Fact Sheet

American Innovation and Manufacturing Act: Fire Suppression Requirements for Hydrofluorocarbons

Background

The American Innovation and Manufacturing (AIM) Act, enacted on December 27, 2020, authorizes the U.S. Environmental Protection Agency (EPA) to address hydrofluorocarbons (HFCs) in three main ways:

- (1) Phasing down HFC production and consumption through an allowance allocation program;
- (2) Maximizing reclamation and minimizing releases of HFCs from equipment and ensuring the safety of technicians and consumers; and
- (3) Facilitating the transition to next-generation technologies by restricting the use of HFCs in the sectors or subsectors in which they are used. This fact sheet concerns the second area – maximizing reclamation and minimizing releases of HFCs, and in particular, the fire suppression sector.

In this fact sheet, EPA is providing information on fire suppression requirements established under the 2024 Emissions Reduction and Reclamation (ER&R) final rule, published on October 11, 2024 ([89 FR 82682](#)). The rule establishes regulatory requirements to minimize the release of HFCs and certain substitutes from equipment (*e.g.*, fire suppression equipment) and to maximize the amount of HFCs reclaimed.

The requirements in the 2024 ER&R final rule do not apply to two fire suppression applications: (1) mission-critical military end uses, and (2) onboard aerospace fire suppression for the period that the application receives an application-specific allowance.¹ In addition, fire suppression equipment does not include military equipment used in deployable and expeditionary situations and also does not include space vehicles.²

Summary of Fire Suppression Requirements

EPA established requirements to minimize releases of HFCs during the installation, servicing, repair, or disposal of fire suppression equipment containing HFCs, or during the use of such equipment for fire suppression technician training. These requirements are outlined in Table 1.³ For further information, refer to the fire suppression provisions at [40 CFR 84.110](#) and the ER&R regulations at [40 CFR part 84, subpart C](#) for full details.



¹ As defined at [40 CFR 84.3](#).

² Refer to [40 CFR 84.102](#) “Fire suppression equipment.”

³ This information is provided for informational purposes only and should not be relied on for compliance.

Table 1: Summary of Fire Suppression Requirements

Provision	Requirements	Compliance Date
Minimize HFC Releases 40 CFR 84.110(a) and 40 CFR 84.110(b)	Minimize releases of HFCs during the installation, servicing, repair, or disposal of fire suppression equipment that contains HFCs.	January 1, 2026
Servicing and/or Repair 40 CFR 84.110(c)	Servicing and/or repair of fire suppression equipment with recycled HFCs, where HFCs are used.	January 1, 2026
Recycling of HFCs 40 CFR 84.110(e) and 40 CFR 84.110(f)	Recycling of HFCs prior to disposal of fire suppression equipment containing HFCs.	January 1, 2026
Fire Suppression Technician Training 40 CFR 84.110(d)	Required training for fire suppression technicians.	By June 1, 2026, or within 30 days of hiring, whichever is later
Recordkeeping and Reporting 40 CFR 84.110(g)	Reporting of certain HFC data; maintain records for three years.	Report annually by February 14 of each year, beginning in 2027
Initial Installation 40 CFR 84.110(c)	Initial installation of fire suppression equipment with recycled HFCs, where HFCs are used.	January 1, 2030

Minimizing Releases of HFCs

Beginning January 1, 2026, covered entities that install, service, repair, or dispose of fire suppression equipment may not knowingly vent or release HFCs into the environment. Likewise, owners and operators of fire suppression equipment containing HFCs should not allow the release of HFCs because of failure to maintain that equipment.

Under [40 CFR 84.110\(a\)](#), the following limited exemptions are available:

- For releases during testing if certain conditions are met (*e.g.*, release is essential to demonstrating equipment functionality);
- During design and development process if certain conditions are met (*e.g.*, where a suitable simulant agent can't be used); or
- For emergency releases of HFCs for the legitimate purpose of fire extinguishing, explosion inertion, or other emergency applications.

Use of Recycled HFCs

Recycled HFCs must be used in the servicing and/or repair (beginning January 1, 2026) and the initial installation (beginning January 1, 2030) of fire suppression equipment, including both total flooding systems and streaming applications. For factory-charged equipment that use HFCs (either neat or in a blend), the equipment must use recycled HFCs for the initial installation during the manufacture of the equipment.

Recycling of HFCs Prior to Disposal

Beginning January 1, 2026, fire suppression equipment containing HFCs and HFCs used as a fire suppression agent must be disposed of accordingly. Refer to Table 2⁴ for disposal methods.

⁴ This information is provided for informational purposes only and should not be relied on for compliance.

Table 2: Disposal Methods

Fire Suppression Equipment Containing HFCs	HFCs Used as a Fire Suppression Agent
Recover the HFCs from the equipment and then send the equipment for disposal.	Send recovered HFCs for recycling to a fire suppressant recycler or reclaimer that is certified under 40 CFR 82.164 .
Leave HFCs in the equipment and send it to a facility for disposal.	Arrange for destruction of the HFCs by using one of the controlled processes listed under 40 CFR 84.29 .

Technician Training

Fire suppression technicians must complete a one-time training requirement covering proper practices, processes, or activities regarding servicing, repair, disposal, or installation of fire suppression equipment.

Starting January 1, 2026, entities employing technicians who install, service, repair, or dispose of fire suppression equipment that contains HFCs must provide technician training no later than June 1, 2026. Any fire suppression technicians hired after January 1, 2026, must complete the training within 30 days of hire or by June 1, 2026, whichever is later.

Reporting Requirements

Certain entities are required to maintain and provide data on HFCs in the fire suppression sector. These include entities (e.g., equipment manufacturers, distributors, or recyclers) that:

- Perform first fill of equipment;
- Service (e.g., recharge) equipment; and/or
- Recycle HFCs.

Beginning in 2027, covered entities must submit data electronically each year by February 14 on the prior year's activity, from January 1 through December 31. For information on reporting, refer to EPA's [Managing Use and Reuse of HFCs and Substitutes website](#). Annual reports must contain basic identification information and the following information for each HFC:

- The quantity of material sold;*
- The quantity of material in inventory onsite, broken out by recovered, recycled, and virgin;*
- The total mass of each HFC sold;*
- The total mass of each HFC in inventory onsite, broken out by recovered, recycled, and virgin; and*
- The total mass of waste products the reporting entity sent for disposal, along with information about the disposal facility if waste is not processed by the reporting entity.

* For installation of new fire suppression equipment, and servicing and/or repair of existing fire suppression equipment.

Recordkeeping Requirements

Beginning in 2027, certain entities must maintain records for three years, including a copy of the annual report submission, records documenting technician training, and records documenting that HFCs are recovered from fire suppression equipment before the equipment is sent for disposal.

Fire Suppression Reporting Requirements under Other EPA Programs

HFC Allocation Program

The HFC Allocation Program includes reporting and recordkeeping requirements for fire suppressant recycling. The information requested includes the quantity of each HFC sent to fire suppressant recyclers, among other reporting activities.

Recordkeeping and reporting requirements for fire suppressant recycling at [40 CFR 84.31\(j\), subpart A](#) are separate from the information required at [40 CFR 84.110\(g\), subpart C](#). If information reported by a fire suppressant recycler under subpart A (e.g., mass of waste products) overlaps with subpart C, the recycler may explain how it satisfies the new reporting requirements under subpart C. Refer to Table 3⁵ for a comparison of the reporting requirements.

Disposable Cylinders

In addition to the fire suppression requirements under [40 CFR 84.110](#), there are requirements under [40 CFR 84.116](#) for disposable cylinders. Fire suppressant recyclers must remove all remaining contents from disposable cylinders prior to discarding the cylinders. Refer to the ER&R's [Additional Resources webpage](#) for more information.

Table 3: Comparison of Fire Suppression Reporting Elements

Category	HFC Allocation (Subpart A)	ER&R (Subpart C)
CFR reference	40 CFR 84.31(j) (reported quarterly and annually)	40 CFR 84.110(g)(1) (reported annually)
Quantity of material	The quantity of material (the combined mass of regulated substance and contaminants) by regulated substance sent to them for recycling (<i>reported quarterly</i>)	The quantity of material (the combined mass of regulated substance and contaminants) sold for the purpose of installing new equipment and servicing fire suppression equipment.
Regulated substance in inventory onsite	The quantity of each regulated substance held in inventory onsite broken out by recovered, recycled, and virgin (<i>reported annually</i>)	The quantity of material (the combined mass of regulated substance and contaminants) in inventory onsite for the purpose of installing new fire suppression equipment and servicing and/or repair of existing fire suppression equipment broken out by recovered, recycled, and virgin. The total mass of each regulated substance in inventory onsite for the purpose of installing new fire suppression equipment and servicing and/or repair of existing fire suppression equipment broken out by recovered, recycled, and virgin.
Total mass of each regulated substance	The total mass of each regulated substance recycled (<i>reported quarterly</i>)	The total mass of each regulated substance sold for the purpose of installing new fire suppression equipment and servicing and/or repair of existing fire suppression equipment.
Total mass of waste products	The total mass of waste products (<i>reported quarterly</i>)	The total mass of waste products the reporting entity sent for disposal, along with information about the disposal facility if waste is not processed by the reporting entity.



Additional Resources

Managing Use and Reuse of HFCs and Their Substitutes:

www.epa.gov/climate-hfcs-reduction/managing-use-and-reuse-hfcs-and-substitutes

Fire Suppression Substitutes:

www.epa.gov/snap/substitutes-fire-suppression-and-explosion-protection

ER&R Additional Resources:

www.epa.gov/climate-hfcs-reduction/resources-managing-hfc-use-and-reuse

Contact EPA: HFCEmissionsReductions@epa.gov

⁵ This information is provided for informational purposes only and should not be relied on for compliance.