



ENVIRONMENTAL APPEALS BOARD
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C.

In re Hudson Technologies, Inc.)
)
) Docket No. CAA-2025-8719
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)
)

FINAL ORDER

Decided March 10, 2026

Before Environmental Appeals Judges Aaron P. Avila and Ammie Roseman-Orr.

Order of the Board by Judge Roseman-Orr:

Pursuant to 40 C.F.R. § 22.18(b)-(c) of EPA’s Consolidated Rules of Practice, the attached Consent Agreement resolving this matter is incorporated by reference into this Final Order and is hereby ratified.

The Respondent is ORDERED to comply with all terms of the Consent Agreement, effective immediately.

So ordered.

**ENVIRONMENTAL APPEALS BOARD
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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In re:

Hudson Technologies, Inc.

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CONSENT AGREEMENT

A. PRELIMINARY STATEMENT

1. This is an administrative penalty assessment proceeding brought for alleged violations of the American Innovation and Manufacturing Act of 2020 (“AIM Act”), 42 U.S.C. § 7675, which governs the import of bulk hydrofluorocarbons (HFCs), under Section 113(d) of the Clean Air Act (“CAA”), 42 U.S.C. § 7413(d); and Sections 22.13 and 22.18 of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and Revocation/Termination or Suspension of Permits (“Consolidated Rules”), codified at 40 C.F.R. Part 22.
2. HFCs are potent greenhouse gases that impact our environment. The United States has committed, as a signatory of the Kigali Amendment to the Montreal Protocol, to reduce its production and consumption of HFCs by 85% in a stepwise manner by the year 2036.
3. Complainant is the United States Environmental Protection Agency (“EPA”). On the EPA’s behalf, Sparsh Khandeshi, Acting Director, Air Enforcement Division, is delegated the authority to settle civil administrative penalty proceedings under Section 113(d) of the CAA.
4. Respondent is Hudson Technologies, Inc. (“Hudson Technologies”), a corporation headquartered in Woodcliff Lake, New Jersey. Respondent is a “person” as defined in Section 302(e) of the CAA, 42 U.S.C. § 7602(e).

5. Complainant and Respondent (together, the “Parties”), having agreed that settlement of this action is in their mutual interest, consent to the issuance of the attached final order (“Final Order” or “Order”) ratifying this Consent Agreement (“Consent Agreement” or “Agreement”) before taking testimony and without adjudication of any issues of law or fact herein, and Respondent agrees to comply with the terms of this Agreement and Final Order. Furthermore, Complainant has determined, and Respondent does not dispute, that settlement of this action is in the public interest.

B. JURISDICTION

6. This Consent Agreement is entered into under Section 113(d) of the CAA, as amended, 42 U.S.C. § 7413(d), and the Consolidated Rules, 40 C.F.R. Part 22.
7. The EPA and the United States Department of Justice jointly determined that this matter, although it involves alleged violations that occurred more than one year before the initiation of this proceeding, is appropriate for an administrative penalty assessment. 42 U.S.C. § 7413(d).
8. The Environmental Appeals Board is authorized to ratify this Consent Agreement, which memorializes a settlement between Complainant and Respondent. 40 C.F.R. §§ 22.4(a) and 22.18(b).
9. The issuance of this Consent Agreement and attached Final Order simultaneously commences and concludes this proceeding. 40 C.F.R. § 22.13(b).

C. GOVERNING LAW

10. This proceeding arises under the AIM Act, 42 U.S.C. § 7675, and CAA Section 113, 42 U.S.C. § 7413, and the regulations promulgated thereunder.
11. The EPA is authorized to enforce the AIM Act and any regulation promulgated thereunder pursuant to the federal enforcement authorities established by Section 113 of the CAA, 42 U.S.C.

§ 7413, as though the AIM Act was expressly included in Title VI of the CAA. 42 U.S.C.

§ 7675(k)(1)(C).

12. The regulations at 40 C.F.R. Part 84, Subpart A, implement the AIM Act requirement to phase down HFC production and consumption.
13. The regulations at 40 C.F.R. Part 84, Subpart A, apply to any person who imports a regulated substance. 40 C.F.R. § 84.1(b).
14. The regulations at 40 C.F.R. Part 84, Subpart A, contain the following definitions:
 - (a) An “allowance” is defined as a “limited authorization for the production or consumption of a regulated substance established under subsection (e) of Section 103 in Division S, Innovation for the Environment, of the Consolidated Appropriations Act, 2021 (Pub. L. 116-260) (the AIM Act). An allowance allocated under subsection (e) of Section 103 in Division S of the AIM Act does not constitute a property right.” 40 C.F.R. § 84.3.
 - (b) “Bulk” is defined as: “[A] regulated substance of any amount that is in a container for the transportation or storage of that substance such as cylinders, drums, ISO tanks, and small cans. A regulated substance that must first be transferred from a container to another container, vessel, or piece of equipment in order to realize its intended use is a bulk substance. A regulated substance contained in a manufactured product such as an appliance, an aerosol can, or a foam is not a bulk substance.” 40 C.F.R. § 84.3.
 - (c) “Consumption allowances” are defined as “a limited authorization to produce and import regulated substances; however, consumption allowances may be used to produce regulated substances only in conjunction with production allowances.” 40 C.F.R. § 84.3.

- (d) “Exchange value” is defined as the “value assigned to a regulated substance in accordance with AIM Act subsections (c) and (e), as applicable, and as provided in Appendix A to [40 C.F.R. Part 84].” 40 C.F.R. § 84.3.¹
- (e) “Exchange value equivalent” (“EVe”) is defined as “the exchange value-weighted amount of a regulated substance obtained by multiplying the mass of a regulated substance by the exchange value of that substance.” 40 C.F.R. § 84.3.
- (f) “Import” is defined as “to land on, bring into, or introduce into, or attempt to land on, bring into, or introduce into, any place subject to the jurisdiction of the United States, regardless of whether that landing, bringing, or introduction constitutes an importation within the meaning of the customs laws of the United States. Offloading used regulated substances recovered from equipment aboard a marine vessel, aircraft, or other aerospace vehicle during servicing is not considered an import.” 40 C.F.R. § 84.3.
- (g) “Importer” is defined as: “[A]ny person who imports a regulated substance into the United States. ‘Importer’ includes the person primarily liable for the payment of any duties on the merchandise or an authorized agent acting on his or her behalf. The term also includes: (1) [t]he consignee; (2) [t]he importer of record; (3) [t]he actual owner; or (4) [t]he transferee, if the right to draw merchandise in a bonded warehouse has been transferred.” 40 C.F.R. § 84.3.
- (h) “Person” is defined as “any individual or legal entity, including an individual, corporation, partnership, association, state, municipality, political subdivision of a state, Indian tribe; any agency, department, or instrumentality of the United States; and any officer, agent, or employee thereof.” 40 C.F.R. § 84.3.

¹ The exchange values are the same as the 100-year Global Warming Potentials (“GWPs”) listed in the 2007 Intergovernmental Panel on Climate Change (“IPCC”) Fourth Assessment Report.

- (i) “Regulated substance” is defined as: “[A] hydrofluorocarbon listed in the table contained in subsection (c)(1) of the AIM Act and a substance included as a regulated substance by the Administrator under the authority granted in subsection (c)(3).” 40 C.F.R. § 84.3.
15. The regulations at 40 C.F.R. § 84.5(b)(1)² provide that “[n]o person may import bulk regulated substances” except by expending, at the time of the import, consumption or application-specific allowances in a quantity equal to the exchange-value weighted equivalent of the regulated substances imported.
16. Pursuant to 40 C.F.R. § 84.31(a), “[a]ny person who produces, imports, exports, transforms, uses as a process agent, destroys, reclaims, or repackages regulated substances” must meet specified recordkeeping and reporting requirements.
17. From January 1, 2022 to September 18, 2023, the regulations at 40 C.F.R. § 84.31(c)(7) (2022) provided that the importer of record must submit an advance notification report for each shipment of regulated substances imported “no later than 14 days before importation.” 40 C.F.R. § 84.31(c)(7) (2022).³
18. Starting September 18, 2023, the regulations at 40 C.F.R. § 84.31(c)(7) provide that the importer of record must submit an advance notification report for each shipment of regulated substances “no later than 10 days if arriving by marine vessel or 5 days for non-marine vessel prior to the date of importation. 40 C.F.R. § 84.31(c)(7).
19. A current list of regulated substances, their chemical formulas, and their exchange values can be found in Appendix A to 40 C.F.R. Part 84. *See* 40 C.F.R. § 84.3.

² The language in 40 C.F.R. § 84.5(b)(1)(i) (2023) was modified slightly from the previous language in 40 C.F.R. § 84.5(b)(1)(i) (2022), but the requirement that every importer must expend consumption or application-specific allowances equal to the exchange-value weighted equivalent of the regulated substances imported remained unchanged.

³ As previously discussed in footnote 2, 40 C.F.R. § 84.31(c)(7) has since been modified, effective September 18, 2023 (see 88 Fed. Reg. 46,836, 46,897 (July 20, 2023)).

20. The exchange value of a blend is calculated by summing the exchange value of each constituent of the blend multiplied by the nominal mass fraction of the constituent within that blend. 40 C.F.R. § 84.64.

21. The HFCs at issue in this matter are assigned the following exchange values:

HFC	Chemical Formula	Exchange Value
HFC-32	CH ₂ F ₂	675.0
HFC-125	C ₂ HF ₅	3,500.0
HFC-134a	CH ₂ FCF ₃	1,430.0
HFC-227ea	CF ₃ CHFCF ₃	3,220.0
R-410A	50% HFC-125, 50% HFC-32	2,087.5
R-422B	55% HFC-125, 42% HFC-134A, 3% 600A ⁴	2208.5

40 C.F.R. Part 84, Appendix A.

22. The CAA authorizes the Administrator of the EPA to assess a civil administrative penalty of not more than \$25,000 per day of violation of Title VI of the CAA, or regulations promulgated thereunder. CAA § 113(a)(3)(A), (d)(1), 42 U.S.C. § 7413(a)(3)(A), (d)(1). Pursuant to the Federal Civil Penalties Inflation Adjustment Act of 1990, Pub. L. 101-410, as amended, and its implementing regulation, the Civil Monetary Penalty Inflation Adjustment Rule, codified at 40 C.F.R. Part 19, the statutory maximum civil administrative penalty has subsequently been raised to \$59,114 per day of violation. 40 C.F.R. § 19.4, Table 1.

D. STIPULATED FACTS

23. Hudson Technologies owns and operates a refrigerant services company located at 300 Tice Boulevard, Suite 290, Woodcliff Lake, New Jersey 07677, and Hudson Technologies is incorporated under the laws of the State of New York.

⁴ The EPA notes that 600A, or isobutane, is not a regulated substance under the AIM Act or its implementing regulations at 40 C.F.R. Part 84. See 40 C.F.R. Part 84, Appendix A.

24. Respondent is a “person,” as that term is defined in 40 C.F.R. § 84.3.
25. Respondent is an “importer,” as that term is defined in 40 C.F.R. § 84.3.
26. From 2022 to 2024, the EPA has issued Hudson Technologies consumption allowances for the importation of HFCs and HFC blends. *See* Phasedown of Hydrofluorocarbons: Notice of 2022 Allowance Allocations for Production and Consumption of Regulated Substances Under the American Innovation and Manufacturing Act of 2020, 86 Fed. Reg. 55,841 (Oct. 7, 2021); Notice of 2023 Allowance Allocations for Production and Consumption of Regulated Substances Under the American Innovation and Manufacturing Act of 2020, 87 Fed. Reg. 61,314 (Oct. 11, 2022); and Notice of 2024 Allowance Allocations for Production and Consumption of Regulated Substances Under the American Innovation and Manufacturing Act of 2020, and Notice of Final Administrative Consequences, 88 Fed. Reg. 72,060 (Oct. 19, 2023).
27. From May 18, 2022 through January 30, 2024, Hudson Technologies imported at least 75 separate shipments of HFCs and HFC blends (“Subject HFCs”), including shipments containing HFC-125, HFC-134a, HFC-227ea, R-410A, and R-422B. The shipments of Subject HFCs and the entry dates of each shipment are identified in the table of Exhibit A of this CAFO.
28. The Subject HFCs identified in Exhibit A of this CAFO are each a “regulated substance,” as that term is defined in 40 C.F.R. § 84.3.
29. Respondent is the importer of record of the Subject HFCs.
30. Respondent submitted an advance notification report for each shipment of Subject HFCs on the date identified in the column titled “Entry Filing Date” in the table of Exhibit A of this CAFO.

E. ALLEGED VIOLATIONS OF LAW

31. From May 18, 2022 through January 30, 2024, Respondent failed to timely submit an advance notification report by the day specified by 40 C.F.R. § 84.31(c)(7) and 40 C.F.R. § 84.31(c)(7)

(2022) for 75 separate import entries of Subject HFCs. The number of days late of each advance notification report is identified in the column titled “Days Advance Notification Reports Late” in the table of Exhibit A of this CAFO.

32. Respondent violated 40 C.F.R. § 84.31(c)(7) and 40 C.F.R. § 84.31(c)(7) (2022) by failing to timely submit an advance notification report for the 75 import entries of Subject HFCs by the day specified by 40 C.F.R. § 84.31(c)(7) and 40 C.F.R. § 84.31(c)(7) (2022).

F. TERMS OF CONSENT AGREEMENT

33. For the purpose of this proceeding, as required by 40 C.F.R. § 22.18(b)(2),

Respondent:

- (a) admits that the EPA has jurisdiction over the subject matter alleged in this Consent Agreement;
- (b) admits the facts stipulated in Section D of this Consent Agreement;
- (c) neither admits nor denies the alleged violations of law stated in Section E of this Consent Agreement;
- (d) consents to the assessment of a civil penalty as stated below;
- (e) waives any right to contest the alleged violations of law; and
- (f) waives its rights to appeal the Order accompanying this Consent Agreement.

34. For the purpose of this proceeding, Respondent:

- (a) agrees that this Consent Agreement states a claim upon which relief may be granted against Respondent;
- (b) acknowledges that this Consent Agreement constitutes an enforcement action for purposes of considering Respondent’s compliance history in any subsequent enforcement actions related to the Respondent;

- (c) waives any and all remedies, claims for relief and otherwise available rights to judicial or administrative review that Respondent may have with respect to any issue of fact or law set forth in this Consent Agreement, including any right of judicial review under Section 307(b)(1) of the Clean Air Act, 42 U.S.C. § 7607(b)(1);
- (d) waives any rights or defenses that Respondent has or may have for this matter to be resolved in federal court, including but not limited to any right to a jury trial, and waives any right to challenge the lawfulness of the Final Order accompanying the Consent Agreement;
- (e) consents to personal jurisdiction in any action to enforce this Agreement or Final Order, or both, in the United States District Court for the District of Columbia;
- (f) waives any rights it may possess at law or in equity to challenge the authority of the EPA to bring a civil action in a United States District Court to compel compliance with this Consent Agreement or Final Order, or both, and to seek an additional penalty for noncompliance with this Consent Agreement or Final Order, and agrees that federal law shall govern in any such civil action;
- (g) acknowledges that this Consent Agreement and attached Final Order will be available to the public and agrees that it does not contain any confidential business information or personally identifiable information;
- (h) acknowledges that its tax identification number may be used for collecting or reporting any delinquent monetary obligation arising from this Consent Agreement (see 31 U.S.C. § 7701);
- (i) certifies that the information it has supplied concerning this matter was at the time of submission true, accurate, and complete; and

- (j) acknowledges that there are significant penalties for knowingly submitting false, fictitious, or fraudulent information, including the possibility of fines and imprisonment (see 18 U.S.C. § 1001).
35. Civil Penalty. The civil penalty agreed upon by the Parties for settlement purposes is \$215,000 (the “Assessed Penalty”).
36. Penalty Payment. Respondent agrees to pay the Assessed Penalty to the United States in the manner specified below:
- (a) pay the Assessed Penalty within 30 calendar days of the Effective Date of this Agreement.
 - (b) pay the Assessed Penalty using any method, provided on the following website <https://www.epa.gov/financial/additional-instructions-making-payments-epa#Pay.gov>.
 - (c) identify each and every payment with Docket No. [CAA-2025-8719]; and
 - (d) within 24 hours of payment of the EPA Penalty, email proof of payment to Hallie Lipsey at Lipsey.Hallie@epa.gov. “Proof of payment” means, as applicable, a copy of the check, confirmation of credit card or debit card payment, confirmation of wire or automated clearinghouse transfer, and any other information required to demonstrate that payment has been made according to the EPA requirements, in the amount due, and identified with Docket No. [CAA-2025-8719].
37. Failure to pay the full amount of the penalty assessed under this Consent Agreement may subject Respondent to a civil action to collect any unpaid portion of the proposed civil penalty and interest. In order to avoid the assessment of interest, administrative costs, and late payment penalty in connection with such civil penalty, as described in the following four paragraphs of this Consent Agreement, Respondent must timely pay the penalty.

38. Interest, Charges, and Penalties on Late Payments. Pursuant to 42 U.S.C. § 7524(c)(6), 31 U.S.C. § 3717, 31 C.F.R. § 901.9, and 40 C.F.R. § 13.11, if Respondent fails to timely pay any portion of the Assessed Penalty per this Agreement, the entire unpaid balance of the Assessed Penalty and all accrued interest shall become immediately due and owing, and the EPA is authorized to recover the following amounts.

(a) Interest. Interest begins to accrue from the Filing Date. If the Assessed Penalty is paid in full within 30 days, interest accrued is waived. If the Assessed Penalty is not paid in full within 30 days, interest will continue to accrue until any unpaid portion of the Assessed Penalty as well as any accrued interest, penalties, and other charges are paid in full. Per 42 U.S.C. § 7524(c)(6), interest will be assessed pursuant to 26 U.S.C. § 6621(a)(2), that is the IRS standard underpayment rate, equal to the Federal short-term rate plus 3 percentage points.

(b) Handling Charges. The United States' enforcement expenses including, but not limited to, attorneys' fees and costs of collection proceedings.

(c) Late Payment Penalty. A 10% quarterly non-payment penalty.

39. Late Penalty Actions. In addition to the amounts described in the prior Paragraph, if Respondent fails to timely pay any portion of the Assessed Penalty, interest, or other charges and penalties per this Consent Agreement and attached Final Order, the EPA may take additional actions. Such actions the EPA may take include, but are not limited to, the following:

(a) Refer the debt to a credit reporting agency or a collection agency, per 40 C.F.R.

§§ 13.13 and 13.14;

(b) Collect the debt by administrative offset (*i.e.*, the withholding of money payable by the United States government to, or held by the United States government for, a person to satisfy the debt the person owes the United States government), which includes, but is

not limited to, referral to the Internal Revenue Service for offset against income tax refunds, per 40 C.F.R. Part 13, Subparts C and H.

- (c) Suspend or revoke Respondent's licenses or other privileges, or suspend or disqualify Respondent from doing business with the EPA or engaging in programs the EPA sponsors or funds, per 40 C.F.R. § 13.17.
- (d) Request that the Attorney General bring a civil action in the appropriate district court to recover the full remaining balance of the Assessed Penalty, in addition to interest and the amounts described above, per 42 U.S.C. § 7524(c)(6). In any such action, the validity, amount, and appropriateness of the Assessed Penalty shall not be subject to review.

40. Allocation of Payments. Pursuant to 31 C.F.R. § 901.9(f) and 40 C.F.R. § 13.11(d), a partial payment of debt will be applied first to outstanding handling charges, second to late penalty charges, third to accrued interest, and last to the principal that is the outstanding Assessed Penalty amount.

41. Tax Treatment of Penalties. Penalties, interest, and other charges paid pursuant to this Consent Agreement and attached Final Order shall not be deductible for purposes of federal taxes.

42. By signing this Agreement, the undersigned representative of Complainant and the undersigned representative of Respondent each certify that he or she is fully authorized to execute and enter into the terms and conditions of this Agreement and has the legal capacity to bind the party he or she represents to this Agreement.

43. By signing this Agreement, Respondent agrees to acceptance of the Complainant's: (a) digital or an original signature on this Agreement; and (b) service of the fully executed Agreement on the Respondent by mail or electronically by e-mail. Complainant agrees to acceptance of the Respondent's digital or an original signature on this Agreement.

44. Except as qualified by Paragraph 38(b), each party shall bear its own attorney's fees, costs, and disbursements incurred in this proceeding.

G. EFFECT OF CONSENT AGREEMENT AND ATTACHED FINAL ORDER

45. In accordance with 40 C.F.R. § 22.18(c), Respondent's full compliance with this Consent Agreement shall only resolve Respondent's liability for federal civil penalties for the violations alleged in Section E of this Consent Agreement.
46. This Consent Agreement and attached Final Order apply to and are binding upon the Complainant and the Respondent. Successors and assigns of Respondent are also bound if they are owned, in whole or in part, directly or indirectly, or otherwise controlled by Respondent. Nothing in the previous sentence adversely affects any right of the EPA under applicable law to assert successor or assignee liability against Respondent's successor or assignee.
47. Pursuant to 26 U.S.C. § 6050X and 26 C.F.R. § 1.6050X-1, EPA is required to annually send to the Internal Revenue Service ("IRS") a completed IRS Form 1098-F ("Fines, Penalties, and Other Amounts") with respect to any court order or settlement agreement (including administrative settlements) that require a payor to pay an aggregate amount that EPA reasonably believes will be equal to, or in excess of, \$50,000 for the payor's violation of any law or the investigation or inquiry into the payor's potential violation of any law, including amounts paid for "restitution or remediation of property" or to come "into compliance with a law." EPA is further required to furnish a written statement, which provides the same information provided to the IRS, to each payor (i.e., a copy of IRS Form 1098-F). Respondent's failure to comply with providing IRS Form W-9 or Tax Identification Number ("TIN"), as described below, may subject Respondent to a penalty, per 26 U.S.C. § 6723, 26 U.S.C. § 6724(d)(3), and 26 C.F.R. § 301.6723-1. To provide

EPA with sufficient information to enable it to fulfill these obligations, Respondent shall complete the following actions as applicable.

- a. Respondent shall complete an IRS Form W-9 (“Request for Taxpayer Identification Number and Certification”), which is available at <https://www.irs.gov/pub/irspdf/fw9.pdf>.
- b. Respondent shall therein certify that its completed IRS Form W-9 includes Respondent’s correct TIN or that Respondent has applied and is waiting for issuance of a TIN.
- c. Respondent shall email its completed Form W-9 to EPA’s Cincinnati Finance Division at wise.milton@epa.gov, on or before the date that Respondent’s penalty payment is due, pursuant to Paragraph 49 of this Agreement, or within 7 days should the order become effective between December 15 and December 31 of the calendar year. EPA recommends encrypting IRS Form W-9 email correspondence.
- d. In the event that Respondent has certified in its completed IRS Form W-9 that it does not yet have a TIN but has applied for a TIN, Respondent shall provide EPA’s Cincinnati Finance Division with Respondent’s TIN, via email, within five (5) days of Respondent’s receipt of a TIN issued by the IRS.

48. This Consent Agreement constitutes the entire agreement and understanding of the Parties and supersedes any prior agreements or understandings among the Parties with respect to the subject matter hereof.

49. This Consent Agreement may be signed in any number of counterparts, each of which will be deemed an original and, when taken together, constitute one agreement; the counterparts are binding on each of the Parties individually as fully and completely as if the Parties had signed one single instrument, so that the rights and liabilities of the Parties will be unaffected by the

failure of any of the undersigned to execute any or all of the counterparts; any signature page and any copy of a signed signature page may be detached from any counterpart and attached to any other counterpart of this Consent Agreement.

50. Nothing in this Agreement shall relieve Respondent of the duty to comply with all applicable provisions of the CAA and other federal, state, or local laws or statutes, nor shall it restrict the EPA's authority to seek compliance with any applicable laws or regulations, nor shall it be construed to be a ruling on, or determination of, any issuerelated to any federal, state, or local permit.
51. Nothing herein shall be construed to limit the power of the EPA to undertake any action against Respondent or any person in response to conditions that may present animminent and substantial endangerment to the public health, welfare, or the environment.
52. The EPA reserves the right to revoke this Consent Agreement and settlement penalty if and to the extent that the EPA finds, after signing this Consent Agreement, that any information provided by Respondent was materially false or inaccurate at the time such information was provided to the EPA, and the EPA reserves the right to assess and collect any and all civil penalties for any violation described herein. The EPA shall give Respondent notice of its intent to revoke, which shall not be effective until received by Respondent in writing.

H. EFFECTIVE DATE

53. Respondent and Complainant agree to the Environmental Appeals Board's issuance of the attached Final Order. The EPA will transmit a copy of the Final Order and ratified Consent Agreement to the Respondent. The date upon which the Final Order is issued is the "Effective Date."

Exhibit A

Entry Date	Entry Filing Date	Entry Number	HFC/HFC Blend	Days Advance Notification Reports Late
30-Jan-24	23-Jan-24	07102564106	HFC-125	3
3-Feb-24	30-Jan-24	07102562290	HFC-125	6
21-Jan-24	18-Jan-24	07102558579	HFC-125	7
30-Sep-23	25-Sep-23	07102540254	HFC-227ea	5
Change in Reporting Requirements. <i>See</i> 40 C.F.R. § 84.31(c)(7) and 40 C.F.R. § 84.31(c)(7) (2022). ⁵				
21-Jun-23	16-Jun-23	07102520777	HFC-125	9
7-Jun-23	5-Jun-23	07102519514	HFC-227ea	12
7-Jun-23	5-Jun-23	07102517179	HFC-125	12
28-May-23	26-May-23	07102512634	HFC-125	12
20-May-23	17-May-23	07102510661	HFC-125	11
20-May-23	17-May-23	07102510638	HFC-125	11
20-May-23	17-May-23	07102510612	HFC-125	11
18-May-23	16-May-23	07102517591	HFC-227ea	12
9-May-23	17-May-23	07102513152	HFC-125	22
9-May-23	17-May-23	07102512261	HFC-125	22
30-Apr-23	27-Apr-23	07102506339	HFC-125	11
28-Apr-23	27-Apr-23	07102509028	HFC-125	13
17-Apr-23	14-Apr-23	07102507576	HFC-125	11
14-Apr-23	14-Apr-23	07102507584	HFC-125	14
11-Apr-23	7-Apr-23	07102506909	HFC-125	10
10-Apr-23	7-Apr-23	07102506883	HFC-125	11
29-Mar-23	27-Mar-23	07102504466	HFC-125	12
7-Mar-23	6-Mar-23	07102501322	HFC-125	13
7-Mar-23	6-Mar-23	07102501314	HFC-125	13
7-Mar-23	6-Mar-23	07102501306	HFC-125	13
7-Mar-23	6-Mar-23	07102501298	HFC-125	13
12-Dec-22	9-Dec-22	07102484099	HFC-125/R-422B	11
12-Dec-22	9-Dec-22	07102484081	HFC-125/R-422B	11

⁵ From January 1, 2022 to September 17, 2023, 40 C.F.R. § 84.31(c)(7) (2022) provided that the importer of record was required to submit an advance notification report for each shipment of regulated substances imported no later than 14 days before importation. Beginning September 18, 2023, 40 C.F.R. § 84.31(c)(7) provides that the importer of record is required to submit an advance notification report for each shipment of regulated substances imported no later than 10 days if arriving by marine vessel or 5 days for non-marine vessel prior to the date of importation.

5-Dec-22	2-Dec-22	07102486060	HFC-125/R-422B	11
28-Nov-22	25-Nov-22	07102484438	HFC-125/R-422B	11
22-Nov-22	22-Nov-22	07102482226	HFC-125/R-422B	14
22-Nov-22	22-Nov-22	07102482218	HFC-125/R-422B	14
22-Nov-22	22-Nov-22	07102482200	HFC-125/R-422B	14
14-Nov-22	8-Nov-22	07102488025	HFC-125	8
10-Nov-22	7-Nov-22	07102487985	HFC-125	11
8-Nov-22	3-Nov-22	07102487621	HFC-125	9
7-Nov-22	7-Nov-22	07102488017	HFC-125	14
7-Nov-22	8-Nov-22	07102485815	HFC-125/R-422B	15
1-Nov-22	31-Oct-22	07102487001	HFC-125	13
30-Oct-22	28-Oct-22	07102485054	HFC-227ea	12
20-Oct-22	18-Oct-22	07102484214	HFC-227ea	12
16-Oct-22	19-Oct-22	07102475048	HFC-125/R-422B	17
7-Oct-22	6-Oct-22	07102483356	HFC-125	13
4-Oct-22	3-Oct-22	07102482788	HFC-125	13
3-Oct-22	17-Oct-22	07102477721	HFC-125/R-422B	28
3-Oct-22	17-Oct-22	07102477713	HFC-125/R-422B	28
1-Oct-22	30-Sep-22	07102469223	HFC-125	13
1-Oct-22	30-Sep-22	07102469207	HFC-125	13
29-Sep-22	29-Sep-22	07102482432	HFC-125	14
28-Sep-22	28-Sep-22	07102479016	HFC-227ea	14
27-Sep-22	20-Oct-22	07102476582	HFC-125	37
26-Sep-22	29-Sep-22	07102476012	HFC-125/R-422B	17
26-Sep-22	29-Sep-22	07102475998	HFC-125/R-422B	17
21-Sep-22	23-Sep-22	07102473399	HFC-125/R-422B	16
21-Sep-22	23-Sep-22	07102473373	HFC-125/R-422B	16
15-Sep-22	13-Sep-22	07102464851	HFC-125	12
14-Sep-22	13-Sep-22	07102464844	HFC-125	13
14-Sep-22	13-Sep-22	07102464836	HFC-125	13
11-Sep-22	26-Sep-22	07102475378	HFC-125/R-422B	29
28-Aug-22	25-Aug-22	07102471971	HFC-125	11
28-Aug-22	25-Aug-22	07102471682	HFC-125	11
13-Aug-22	15-Aug-22	07102469439	HFC-125	16
13-Aug-22	15-Aug-22	07102469421	HFC-125	16
13-Aug-22	15-Aug-22	07102469413	HFC-125	16
13-Aug-22	15-Aug-22	07102469397	HFC-125	16
13-Aug-22	15-Aug-22	07102469389	HFC-125	16
13-Aug-22	15-Aug-22	07102469371	HFC-125	16

3-Aug-22	5-Aug-22	07102474082	HFC-227ea	16
13-Jul-22	2-Aug-22	07102466013	R-410A	34
24-Jun-22	1-Jul-22	07102462459	HFC-134a	21
24-Jun-22	29-Jun-22	07102462129	HFC-134a	19
15-Jun-22	15-Jun-22	07102461063	HFC-134a	14
5-Jun-22	8-Jun-22	07102456626	HFC-134a	17
31-May-22	3-Jun-22	07102460271	HFC-134a	17
31-May-22	3-Jun-22	07102457087	HFC-134a	17
20-May-22	18-May-22	07102456287	HFC-134a	12

The foregoing Consent Agreement *In the Matter of Hudson Technologies, Inc.*, Docket No. CAA-2025-8719, is Hereby Stipulated, Agreed, and Approved for Entry.

FOR RESPONDENT:



Signature

Date 9/4/2025

Printed Name: Brian Coleman

Title: President & Chief Executive Officer

Address: 300 Tice Blvd Suite 290 Woodcliff Lake, NJ 07677

Federal Tax Identification Number: 13-3641539

The foregoing Consent Agreement *In the Matter of Hudson Technologies, Inc.*, Docket No. CAA-2025-8719, is Hereby Stipulated, Agreed, and Approved for Entry.

COMPLAINANT:

SPARSH
KHANDESHI

Digitally signed by
SPARSH KHANDESHI
Date: 2025.12.12
11:32:38 -05'00'

Sparsh Khandeshi, Acting Director
Air Enforcement Division

CERTIFICATE OF SERVICE

I certify that copies of the foregoing “Consent Agreement” and “Final Order” in the matter of Hudson Technologies, Inc., Docket No. CAA-2025-8719, were sent to the following persons on March 10, 2026, in the manner indicated:

By E-mail:

Hallie Lipsey, Attorney Advisor
United States Environmental Protection Agency
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Tommie Madison
Clerk of the Board