

e-GGRT and HFC Data Reporting related to AIM

Background

This page includes information on using EPA's electronic Greenhouse Gas Reporting Tool (e-GGRT) to report to EPA certain hydrofluorocarbon (HFC) information related to the American Innovation and Manufacturing (AIM) Act, which was enacted on December 27, 2020. The AIM Act directs EPA to phase down production and consumption of HFCs in the United States by using an HFC allowance allocation and trading program. In response to this legislation, the EPA Administrator signed a final rule on September 23, 2021. The final rule sets the HFC production and consumption baseline levels from which reductions will be made, establishes an initial methodology for allocating and trading HFC allowances for 2022 and 2023, and creates a robust, agile, and innovative compliance and enforcement system. More information about the final rule can be found here: <https://www.epa.gov/climate-hfcs-reduction/final-rule-phasedown-hydrofluorocarbons-establishing-allowance-allocation>.

As part of the rulemaking process, EPA referenced historical data on the production and import of HFCs collected through e-GGRT. On October 1, 2021, EPA issued allowances to companies that produced and/or imported HFCs in 2020, based on the three highest years of production or consumption between 2011-2019. More information on the 2022 HFC allowance allocations can be found here: <https://www.epa.gov/climate-hfcs-reduction/final-rule-phasedown-hydrofluorocarbons-establishing-allowance-allocation>.

EPA is currently requiring that reporters review HFC activity data that your company previously submitted to the GHGRP under 40 CFR Part 98 subpart OO for reporting years 2011 through 2021 and determine if any of the data that you previously certified (under §98.4(e)(1)) requires correction. Companies must correct their reported HFC activity information within 45 days of notification by the Agency (via correspondence message or certified mail) for that information to be considered in the 2024 allowance determination process. If after reviewing your company's HFC activity, you determine that any previously certified reports contain substantive error(s), you should correct the values and recertify your report via e-GGRT, in accordance with 40 CFR 98.3(h) using the forms and instructions [below](#).

Reporting on HFC Production, Imports, Exports, and Destruction

The GHGRP requires certain suppliers of HFCs to report their activities to EPA annually under 40 CFR part 98, subpart OO. As further detailed in subpart A and subpart OO of the GHGRP, suppliers who are required to report under subpart OO include, but are not limited to:

- All producers of HFCs;
- Importers or exporters who annually either import or export fluorinated GHGs (including bulk HFCs), fluorinated heat transfer fluids (HTFs), nitrous oxide, and carbon dioxide that in combination total 25,000 metric tons carbon dioxide equivalent (CO₂e) or more; and
- Facilities that annually destroy a total of 25,000 metric tons CO₂e or more of fluorinated GHGs (including HFCs) or fluorinated HTFs.

e-GGRT is limited to submitting and revising GHGRP annual reports for years 2018 to 2022. However, EPA has made available a special 'back-year' form years 2011 to 2017 for HFC suppliers who did not submit an annual report for one or more of those years, and would now like to submit their supply data for those corresponding years and for HFC suppliers that want to revise information previously submitted for years 2011 to 2017.



You must use the back-year form to submit data for 2011 to 2017 and the back-year form may only be submitted in e-GGRT by attaching them to the GHGRP 2020 annual report in e-GGRT. If you are not familiar with how to submit an annual report via e-GGRT, see [detailed instruction links below](#).

Note that if your facility is subject to GHGRP and failed to provide a timely annual report, your facility may be out of compliance with 40 CFR Part 98 and the Clean Air Act.

Regardless of whether a company must report under the GHGRP, anyone seeking allowances under the set-aside as an importer of HFCs must provide import data from 2011-2020.

e-GGRT Reporting Instructions

See [Uploading Back-year GHGRP Data](#) for detailed reporting instructions for Reporting years **2011-2017**.

See [Subpart OO Reporting Form Instructions](#) for detailed reporting instructions for Reporting years **2018 and forward**.

Download Reporting Forms

[Subpart OO - Special 2011 - 2017 Backyear Form for Companies that Import or Export](#)

[Subpart OO - Special 2011 - 2017 Backyear Form for Facilities that Produce Transform or Destroy](#)

[Subpart OO - Empty Reporting Form for Reporters Not Subject to Part 98 for RY2020.xlsx](#)

HELP DESK

For questions regarding registration, reporting questions, or any issues submitting your HFC data, please complete this [form](#).

