

HELPFUL HINTS FOR COMPLETING EPA'S CLASS I REPORTING FORMS

Overview

This "helpful hints" document for completing EPA's Class I reporting forms provides insights to common errors made by reporting entities when completing reporting forms. It also highlights notable revisions made to some reporting forms. This quick reference serves to clarify EPA's data collection needs and improve data quality.

Please note that when we refer to Class I substances in this section, we are not including methyl bromide. Although methyl bromide is a Class I substance under EPA regulations, separate [reporting forms](#) have been developed to collect methyl bromide data. The only "Class I" form that captures methyl bromide data is the "Essential Use Allowance Holder & Laboratory Supplier Quarterly Report and Essential Use Allowance Holder Annual Report," as discussed below.

There are 8 Class I reporting forms available for use from EPA.

[Class I Producer Quarterly Report](#)

[Class I Importer Quarterly Report](#)

[Class I Exporter Quarterly Report](#)

[Notification of Class I Transfers](#)

[Essential Use Holder and Laboratory Supplier Quarterly Report](#)

[Class I Laboratory Certification Report](#)

[Class I 2nd Party Destruction Annual Report](#)

[Class I 2nd Party Transformation Annual Report](#)

Click on the link(s) for the form you are interested in. If you are not sure what form(s) pertains to your company, please refer to [What Forms Should I Complete?](#) If you need further assistance, please contact:

[Staci Gatica](#)

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Hints for Completing the "Class I Producer Quarterly Report"

Purpose: This form is used to capture all U.S. production of Class I substances for all purposes.

Reporting Frequency: Quarterly

Helpful Hints:

1. Production companies should report production totals to EPA for every quarter. If an entity has zero production for a given quarter, the entity should submit a fax to [Mike James](#) (fax #: 202-343-2336) to confirm zero production. If a company fails to report or indicate no production for a quarter, EPA is unable to determine whether that is an indication of zero production or if an entity's report was not received. If your company has not produced a Class I substance for at least a year and does not intend to produce a Class I substance during the following year, it is not necessary to report zero production.
2. In "Section 2.2: Company Production Totals", the 2nd Party Transformation column (column D) refers to an amount of Class I substance that was produced for 2nd party transformation. Only the actual producer of Class I substance should use this form to report. This form should not be used by an entity transforming Class I substances that it did NOT produce. The form, "Class I 2nd Party Transformation Report," is available for entities reporting transformation of Class I substances that they did not produce.
3. Likewise, the 2nd Party Destruction column (column F) of the same section refers to amounts of Class I substances that were produced for 2nd party destruction. Only the actual producer of the Class I substance being destroyed should complete this reporting form. This form should not be used by an entity destroying Class I substances that it did NOT produce. The form, "Class I 2nd Party Destruction Report," is available for entities reporting destruction of Class I substances that they did not produce.

Notable Changes:

1. As of January 1, 2010, Article 5 production allowances of Class I substances are no longer available. As a result, the column for data on Article 5 production has been removed from Section 2.2 and Section 3 has been deleted.

Hints for Completing the "Class I Importer Quarterly Report"

Purpose: This form is used to capture information related to all imports of Class I substances into the United States.

Reporting Frequency: Quarterly

Helpful Hints:

1. Companies should report import totals to EPA for every quarter. If an entity has zero imports for a given quarter, the entity should submit a fax to [Mike James](#) (fax #: 202-343-2336) to confirm zero imports. If a company fails to report or indicate no import for a quarter, EPA is unable to determine whether that is an indication of zero imports or if an entity's report was not received. If your company has not imported a Class I substance for at least a year and does not intend to import a Class I substance during the following year, it is not necessary to report zero imports.
2. For reporting purposes, the U.S. Territories (i.e., Puerto Rico, U.S. Virgin Islands, American Samoa, Guam, and Northern Mariana Islands) are treated as part of the United States. Any import *into* a U.S. Territory from a foreign nation, should be reported in your quarterly report. Alternatively, an import into the continental U.S. *from* a U.S. Territory need not be reported in your quarterly report.
3. Please note in Column G of Section 3.2 (Gross Import of Class I Substance) that, for EPA's reporting purposes, "Gross Imports" does not include imports of 'Heels' or 'Used' Class I substances. Rather, the quantity provided in column G should equal the sum of the amounts that are reported in columns B through F.

Notable Changes: None

Hints for Completing the "Class I Exporter Annual Report"

Purpose: This form is used to capture information about Class I exports.

Reporting Frequency: Annually

Helpful Hints:

1. For reporting purposes, the U.S. Territories (i.e., Puerto Rico, U.S. Virgin Islands, American Samoa, Guam, and Northern Mariana Islands) are treated as part of the United States. Any export *from* a U.S. Territory into a foreign nation, should be reported in your quarterly report. Alternatively, an export from the continental U.S. *into* a U.S. Territory need not be reported in your quarterly report.
2. Chemical commodity codes are provided in section 3 for commonly exported Class I substances. If data are reported on a chemical that is not already listed, a commodity code must be provided by the reporting entity.

Notable Changes:

1. The previous version of the Class I Exporter Report contained sections for two different types of data: Article 5 (A5) Class I exporter quarterly data and non-A5 Class I exporter annual data. The sections that requested quarterly data on A5 exports (Sections 2.B and 3.B) have been removed because Class I A5 allowances were terminated beginning January 1, 2010 (40 CFR 82.9(a)(4)).

Hints for Completing the "Notification of Class I Transfers Report"

Purpose: This form is used to capture trades of Essential Use Allowances or Essential Use CFCs. Please note that an "allowance" (for Essential Use Allowances) refers to the right to produce a particular chemical, while a "trade" (for Essential Use CFCs) refers to a trade of product that has *already* been produced.

Reporting Frequency: A form should be sent by the transferor to EPA for every transfer request. This may happen more than once, or not at all, in any particular quarter.

Helpful Hints: None

Notable Changes:

1. Due to the phaseout of Class I Article 5 allowances as of January 1, 2010, trades of Article 5 allowances are no longer possible. As such, the reporting form has been updated to remove the option of trading Article 5 allowances.

Hints for Completing the "Essential Use Allowance Holder & Laboratory Supplier Quarterly Report and Essential Use Allowance Holder Annual Report"

Purpose: This form is used to collect the types and amount of essential-use chemicals obtained and supplied by essential use allowance holders and distributors of laboratory supplies. It is also used to collect annual data pertaining to the manufacture of MDIs.

Reporting Frequency: Quarterly (Sections 2, 3, and 4); Annually (Section 5)

Helpful Hints:

1. All distributors of laboratory supplies, including secondary distributors, need to report all purchases and sales of Class I substances under the laboratory and analytical use exemption. A “distributor of laboratory supplies” is defined as any person that purchases and sells controlled substances to laboratory customers for essential laboratory and analytical uses.
2. Methyl bromide is permitted for use under the Laboratory & Analytical Use Exemption. Thus, purchases and sales of methyl bromide should be reported in Sections 2 and 3 of the report, respectively. Summary data on methyl bromide should also be detailed in Section 4.
3. Under Section 2, essential-use allowance holders and distributors of laboratory supplies are required to provide the amount of ODS purchased or received from producers and/or importers. In addition to quantities of ODS chemicals that are ultimately distributed, this includes quantities of ODS chemicals that are purchased strictly for internal laboratory and/or analytical use, even if the chemicals are not distributed under the Laboratory & Analytical Laboratory Use Exemption. ODS chemicals used for internal use should also be reported under Section 3. If a distributor, let’s say Company X, also uses ODS chemical internally, when filling out Section 3, they should list themselves (Company X) as a “Lab Company” supplied to under the exemption.
4. Transactions listed in Section 2 should be summarized in Section 4, Column B (Total Quantity of Essential Use Class I ODS Received from Producers/Importers [kg]), even if the quantity received is to be distributed under the Laboratory & Analytical Use Exemption. The Laboratory & Analytical Use Exemption along with Meter-Dosed Inhalers (MDIs) are considered Essential Uses.

Notable Changes:

1. Section 4 now includes a row for methyl bromide in Column A.

Section 5 Instructions:

- Column B of Section 5 (Amount Acquired by Production [kg.]) should include only those newly produced CFCs for which essential use allowances were conferred in the given reporting period. If CFCs were received via a 1) EPA-approved transfer of essential use CFCs, or 2) sale of pre-1996 CFCs, please indicate those amounts, along with the source company, in the transmittal memo to EPA.
- Column C of Section 5 (Amount Acquired for Essential Uses by Import and Country[s] of Manufacture) should list ONLY those CFCs that were imported on behalf of the reporting entity for MDI essential use purposes.
- Column D of Section 5 (Amounts on Hand at end of Year [includes pre-1996 amounts]) should only list the amounts of pharmagrade-CFCs that your company owns. This includes amounts that your company is currently holding AND the amounts that another company is holding on your behalf. If another company is holding your pharmagrade CFCs, please list the name of that company and the quantity that they are holding on your behalf (Note, the amounts listed in this column include BOTH pre-1996 and post-1996 CFCs.).
- Column E of Section 5 (Pre-phaseout [pre-1996] Stockpiled Amounts Held at the End of the Year [kg]) should list the amounts of pre-1996 pharmagrade-CFCs that your company owns. This includes amounts that your company is currently holding AND the amounts that another company is holding on your behalf. If another company is holding your pre-1996 pharmagrade CFCs, please list the name of that company and the quantity that they are holding on your behalf. (Note, the difference between amounts listed in Column D and Column E should be the amount of the post-1996 pharmagrade-CFCs that your company owns.)
- Column F of Section 5 (Amount Used for the Essential Uses [kg]) should list the amount of CFCs that were used in the manufacture of your MDIs (i.e., amounts contained in the MDIs). This amount DOES NOT include amounts of CFCs that were "lost" in the manufacturing process.
- Column G of Section 5 (Amount Contained in Exported Products [kg]) should list the amount of CFCs that were contained in MDIs that your company exported.

- Column H of Section 5 (Amounts Destroyed or Recycled [kg]) should list the amounts of CFCs that were "lost" (i.e. destroyed and/or recycled) in the manufacturing of your MDIs.
- Column I of Section 5 (Total Number of Marketable MDIs Manufactured) should capture the number of units produced.

Hints for Completing the "Class I Laboratory Certification Report"

Purpose: This form is for distributors or laboratory customers purchasing Class I substances under the global laboratory essential use exemption. It is used to certify to the seller of laboratory use Class I substances that the buyer will use the substances solely for laboratory applications and will not resell or use the Class I laboratory substances in manufacturing. This form is not submitted to EPA.

Reporting Frequency: For every purchase of laboratory use Class I substances.

Helpful Hints: As a reminder, EPA does not collect this report. It is to be submitted by the distributor or laboratory customer to the company from whom the Class I substance was purchased.

Notable Changes: None

Hints for Completing the "Class I 2nd Party Destruction Annual Report"

Purpose: The form is used to collect information on Class I substances that were destroyed by any entity that did not produce the material (a "2nd" party).

Reporting Frequency: Annually

Helpful Hints:

1. EPA has found that some companies will submit 2nd-party destruction amounts on the producer report, even if they are NOT the producer of the chemical that was destroyed. This is not the correct procedure. Only the actual producer of the chemical should indicate, on the Producer Report, the amount that they "produced" for 2nd Party Destruction. The Class I 2nd Party Destruction Report should be used by any purchaser that destroys the chemical as a "2nd party" (i.e., an entity that did NOT produce the chemical).

Notable Changes: None.

Hints for Completing the "Class I 2nd Party Transformation Annual Report"

Purpose: The form is used to collect information on Class I substances that were transformed by any entity that did not produce the material (a "2nd" party).

Reporting Frequency: Annually

Helpful Hints:

1. EPA has found that some companies will submit 2nd-party destruction amounts on the producer report, even if they are NOT the producer of the chemical that was destroyed. This is not the correct procedure. Only the actual producer of the chemical should indicate, on the Producer Report, the amount that they "produced" for 2nd Party Destruction. The Class I 2nd Party Destruction Report should be used by any purchaser that destroys the chemical as a "2nd party" (i.e., an entity that did NOT produce the chemical).

Notable Changes:

1. None