

# Imports and exports of pre-charged equipment and closed-cell foams containing fluorinated GHGs



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## Subpart QQ, Mandatory Reporting of Greenhouse Gases

*Under the Mandatory Reporting Rule for Additional Sources of Fluorinated Greenhouse Gases (GHGs), importers and exporters of fluorinated GHGs contained in pre-charged equipment or closed-cell foams (as described below) must report the quantity of each fluorinated GHG imported or exported. Importers and exporters of these types of equipment or foams are required to collect data on their products, calculate the fluorinated GHGs imported or exported within the equipment or foams, and follow the specified procedures for quality assurance, missing data, recordkeeping, and reporting.*

### How Is This Source Category Defined?

This source category consists of importers and exporters of pre-charged equipment and closed-cell foams that contain fluorinated GHGs. Importers and exporters of pre-charged equipment and closed-cell foams that contain fluorinated GHGs have to report if either their total imports or their total exports of fluorinated GHGs in equipment and foams is greater than or equal to 25,000 metric tons of CO<sub>2</sub>e per year. This threshold is the same as that for bulk imports and exports of fluorinated GHGs in subpart OO (Suppliers of Industrial Greenhouse Gases) of the final Mandatory Reporting of GHGs Rule published on October 30, 2009 (74 FR 56260).

- Pre-charged equipment is any appliance, appliance component, electrical equipment, or electrical equipment component that is charged with a fluorinated GHG prior to sale or distribution or offer for sale or distribution. This definition includes both equipment that contains the full charge necessary for operation and equipment that contains a partial “holding” charge of the fluorinated GHG.
  - Appliances means any device that contains and uses a fluorinated GHG refrigerant and is used for household or commercial purposes, such as air conditioners, motor vehicle air conditioners, refrigerators, chillers, and freezers.
  - Electrical equipment includes (but is not limited to) gas-insulated substations, circuit breakers, other switchgear, gas-insulated lines, and power transformers.
- Closed-cell foam is any foam product, excluding packaging foam, constructed with a closed-cell structure and a blowing agent containing a fluorinated GHG. This definition includes (but is not limited to) polyurethane (PU) foam contained in equipment, PU continuous and discontinuous panel foam, PU one component foam, PU spray foam, extruded polystyrene (XPS) boardstock foam, and XPS sheet foam.

### What GHGs Must Be Reported?

The rule requires importers and exporters of fluorinated GHGs contained in pre-charged equipment or closed-cell foams to report the mass of each fluorinated GHG contained in the equipment or foam that is imported or exported during the calendar year. Fluorinated GHGs include hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF<sub>6</sub>), and other gases as defined by the final Mandatory Reporting of Greenhouse Gases Rule. In general, pre-charged appliances contain HFC refrigerants (and in some cases, HFC blowing agents in insulating closed-cell foams); pre-charged electrical equipment contains SF<sub>6</sub> or PFCs; and closed-cell foams contain HFC blowing agents. However, if a particular piece

of imported or exported equipment or foam contained another fluorinated GHG, the importer or exporter are required to report that fluorinated GHG.

## **How Must GHGs Be Calculated?**

Importers and exporters determine the total mass of fluorinated GHG imported or exported in their equipment or closed-cell foams as follows:

- For each type of equipment containing a fluorinated GHG used as a refrigerant or electrical insulator, multiply the fluorinated GHG charge per unit of equipment by the number of units of equipment imported or exported annually.
- For each type of equipment with closed-cell foam that contains a fluorinated GHG, multiply the mass of fluorinated GHG in the closed-cell foam in each unit of equipment by the number of units of equipment imported or exported annually.
- For each type of closed-cell foam containing a fluorinated GHG that is imported or exported in bulk, multiply the fluorinated GHG charge per cubic foot of foam by the amount of foam in cubic feet imported or exported annually.

## **When Does Reporting Begin?**

Facilities subject to subpart QQ must begin monitoring GHG emissions on January 1, 2011 in accordance with the methods specified in subpart QQ. For 2012 only, the GHG report must be submitted to EPA by September 28, 2012.

Starting in 2013 and each year thereafter, reports must be submitted to EPA by March 31 of each year, unless the 31st is a Saturday, Sunday, or federal holiday, in which case the reports are due on the next business day.

## **What Information Must Be Reported?**

In addition to the information required by the General Provisions at 40 CFR 98.3(c), under this rule each importer and exporter must submit an annual report with the following information summarized at the corporate level:

- Total mass of each fluorinated GHG imported or exported in pre-charged equipment or closed-cell foams.
- For each type of pre-charged equipment, the identity of the fluorinated GHG used as a refrigerant or electrical insulator, charge size (including holding charge, if applicable), and the number of pieces of equipment imported or exported.
- For closed-cell foams imported or exported inside of appliances, for each appliance type, the identity of the fluorinated GHG contained in the foam, the quantity of fluorinated GHG contained in the foam in each appliance, and the number of appliances imported or exported.
- For closed-cell foams not imported or exported inside appliances, for each foam type, the identity of the fluorinated GHG contained in the foam, the density of the fluorinated GHG in the foam, and the quantity of foam imported or exported.
- If the identity and mass of the fluorinated GHG within the closed-cell foam is unknown, for each foam type, the name of the foam manufacturer and certification that the importer or exporter was unable to obtain information on the identity and mass of the fluorinated GHG.

## For More Information

This document is provided solely for informational purposes. It does not provide legal advice, have legally binding effect, or expressly or implicitly create, expand, or limit any legal rights, obligations, responsibilities, expectations, or benefits in regard to any person. The series of information sheets is intended to assist reporting facilities/owners in understanding key provisions of the rule. They are not intended to be a substitute for the rule.

Visit EPA's Web site (<http://www.epa.gov/ghgreporting/index.html>) for more information and additional information sheets, or go to [www.regulations.gov](http://www.regulations.gov) to access the rulemaking docket EPA-HQ-OAR-2009-0927.