



**Reclamation Reporting**  
**Under Section 608 of the Clean Air Act (CAA) and**  
**the American Innovation and Manufacturing (AIM) Act**  
**Informational Webinar**

January 18, 2024 | 1 P.M. Eastern

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*Stratospheric Protection Division*

- CAA Section 608 Reporting
- The AIM Act Reporting
- Troubleshooting and Resources
- Q&A

- **Purpose:** To provide information to reclaimers on reporting obligations for 2023 reclamation data under Section 608 of the Clean Air Act (CAA) and the American Innovation and Manufacturing (AIM) Act HFC Allocation Program.
- This webinar will be posted online.
- Materials will be posted at:  
<https://www.epa.gov/section608/recordkeeping-and-reporting-requirements-stationary-refrigeration#reclaimers>.

Unless called to speak, please keep Mic on **MUTE**

- If joining by phone unmute by entering \*6

During Q&A session

- Raise your **HAND** to ask to speak
- Open **CHAT** to submit question or ask to speak
- Please state your **NAME** and **AFFILIATION**
- Please be mindful of time to allow others opportunity to ask a questions

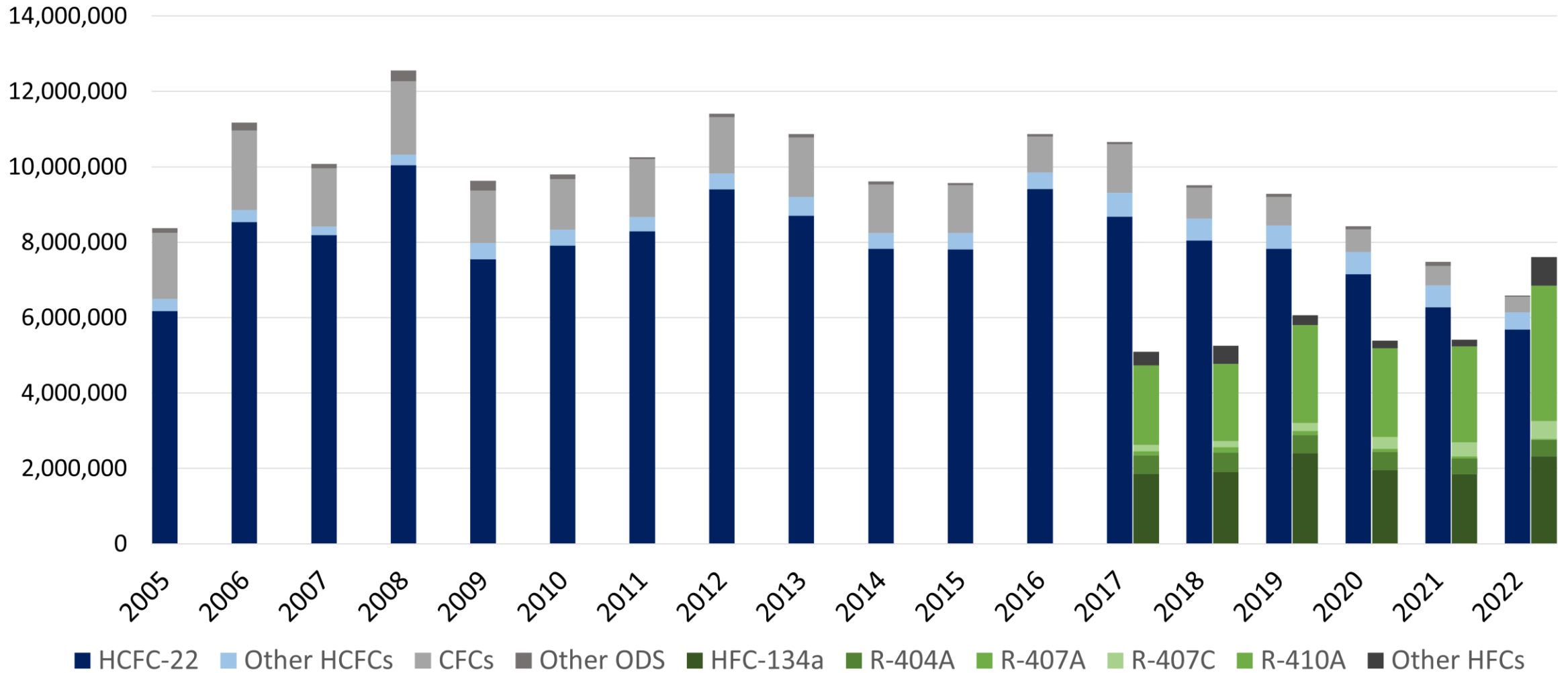
If your internet connection is unstable

- Turning off your **VIDEO** might help

# Reclamation Data



Reclaimed ODS and HFC Refrigerant (lbs)



# Reporting under Clean Air Act (CAA) Section 608

- Under Section 608 of the CAA (40 CFR Part 82, Subpart F), EPA-certified reclaimers are required to report:
  - The total annual quantity of materials (i.e., the combined mass of refrigerant and contaminants) by refrigerant type sent for reclamation.
  - The total annual mass of each refrigerant reclaimed.
  - The total annual mass of waste products.
- Reclaimers must report the quantities recovered and received for both ozone-depleting substances (ODS) and hydrofluorocarbons (HFCs).
- This information must be summarized in a report and submitted to the EPA by **February 1** of the following calendar year.
- 608 reports can be submitted via the central data exchange (CDX) or via the [608reports@epa.gov](mailto:608reports@epa.gov) mailbox.



# CAA: 608 Reporting Form



- *There is no required standard reporting form for 608 report submissions.*
- EPA recommends using our 608 reporting template. This form can be found on our website:  
<https://www.epa.gov/section608/recordkeeping-and-reporting-requirements-stationary-refrigeration#reclaimers>

## U.S. Environmental Protection Agency Stratospheric Protection Division

OMB Control Number: 2060-0256  
Expiration Date: 04/30/2023

### Reclamation Annual Report (Sec 82.166)

#### Instructions

Complete this form by filling in the data fields that are highlighted in blue. Use the arrows to navigate between the tabs.

To submit, please send your completed report through the Central Data Exchange (CDX). Refer to EPA's website for additional information on form submission: <https://www.epa.gov/ods-phaseout/ozone-depleting-substances-ods-recordkeeping-and-reporting>. Alternatively, completed reports may be emailed to: [608reports@epa.gov](mailto:608reports@epa.gov).

#### Section 1: Report Identification Information

Date of Submission:	
Reporting Year:	

Company Name:	
Street Address:	
City:	
State:	
ZIP code:	

Contact Person Name:	
Email Address:	
Phone Number:	
Fax Number:	

# CAA: 608 Reporting Form



**U.S. Environmental Protection Agency**  
**Stratospheric Protection Division**  
*Reclamation Annual Report (Sec 82.166)*

Company Name:

Reporting Year:



**Section 2: Reclamation Data**

Mass of Waste Products (kg)	
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Name of the Refrigerant Reclaimed	Mass of Material Received (kg)	Mass of Refrigerant Reclaimed (kg)
TOTAL	0.00	0.00

Select the name of the refrigerant reclaimed. If "other" is selected, please specify the refrigerant reclaimed below.

- The Central Data Exchange (CDX) is the secure, password-protected online platform used by the EPA for electronic reporting.
- EPA recommends your company submit your reports via CDX.
- Details on how to utilize this platform to submit your 608 reports can be found on our website: <https://www.epa.gov/section608/recordkeeping-and-reporting-requirements-stationary-refrigeration#reclaimers>

- Please submit your company data in kilograms.
  - Also ensure your company is using an appropriate conversion factor (e.g., 2.20462 Lbs → Kgs).
- If your company is asked to resubmit its 608 report, please resubmit a **complete** report, including your company's complete ODS and HFC figures.
- To avoid reporting discrepancies between 608 and AIM, please report all mixed refrigerants as the estimated quantities of individual HFCs and ODS components that are salvageable within those mixtures.
- To avoid any miscommunication, please update the EPA if your company has a new point of contact (POC) for reporting.

# HFC Allocation Program Reporting Under the AIM Act

# HFC Allocation Program Reporting Requirements



- HFC reporting and recordkeeping requirements are codified in 40 CFR part 84.
- All reports are to be submitted quarterly to the EPA through the **HFC and ODS Allowance Tracking (HAWK)** reporting module, within the electronic Greenhouse Gas Reporting Tool (e-GGRT).

Reporting Period	Covered Period	Reports Date
Quarter 1	January 1–March 31	May 15
Quarter 2	April 1–June 30	August 14
Quarter 3	July 1–September 30	November 14
Quarter 4	October 1–December 31	February 14

- Reclaimers must submit quarterly reports within 45 days after the end of the quarter.
- Reports must contain:
  - Quantity of material (combined mass of regulated HFCs and contaminants) by regulated HFC sent to them for reclamation.
  - Total mass of each regulated HFC.
  - Total mass of waste products.
  - 4<sup>th</sup> quarter reports will also include an end of year inventory.
    - Reclaimers must report the quantities of each regulated HFC held in inventory onsite as of December 31 broken out by whether the regulated substance is recovered (i.e., awaiting reclamation), reclaimed, and virgin.

Note: Individuals that are registered with the company will receive a confirmation email from [eggert@ccdsupport.com](mailto:eggert@ccdsupport.com) once your company representative has submitted a report.

- To receive a unique HAWK/HFC reporting system registration invitation, entities must provide the following information to the EPA at [HFCAllocation@epa.gov](mailto:HFCAllocation@epa.gov):
  - **Company Name** - Companies that are majority owned and/or controlled by the same individual(s) must report to the EPA under a single company name
  - **Corporate Address**
  - **Company Representative Name** - The designated officer that will serve as the entity's main point of contact for all HFC reporting under the HFC allocation program
  - **Company Representative Email**
  - **Company Representative Phone**

\*Companies must register with e-GGRT prior to registering with HAWK/HFC reporting system.



# AIM: HAWK Reporting Process



**Step 1-** Register with HAWK/HFC reporting system (one-time step)\*

**Step 2-** Fill out the applicable reporting form

**Step 3-** Submit the report along with any supplemental files to EPA via HAWK/HFC reporting system

**Step 4-** Revise submission, as needed, via HAWK/HFC reporting system

**Step 5-** Receive outcome documentation from EPA via HAWK/HFC reporting system

\*Companies register with e-GGRT prior to registering with HAWK/HFC reporting system.

*EPA  
Reviews  
Submission*

*EPA Reviews  
Resubmission  
(if applicable)*

# AIM: Company Management



- Under company management tab select manage to:
  - Reassign the company representative (CR).
  - Appoint delegates.
  - Edit company address.
  - Add a new facility.

The screenshot shows the EPA AIMRS website interface. At the top, the EPA logo and 'United States Environmental Protection Agency' are visible. A navigation bar contains 'Home', 'Company Management' (circled in red), and 'Import Petitions'. A user greeting 'Hello, George Potemkin | My Profile | Logout' is on the right. Below the navigation is a large landscape image. A text block provides information about OMB approval and response requirements. A table titled 'Access your AIMRS Companies' lists a company named 'MLH Resources' with a 'Manage' button circled in red. On the right side, there is a section for 'Accept an appointment' with a text input field and a 'GO' button, and a yellow-bordered box with a link to 'Go to e-GGRT for GHG Reporting'.

United States Environmental Protection Agency

Home Company Management Import Petitions

Hello, George Potemkin | My Profile | Logout

**Accept an appointment:**

If you received an email to accept an appointment to a company, paste the 1-time Invitation Code into the field, then click 'GO'.

You are also a reporter under EPA's Greenhouse Gas Reporting Program (40 CFR Part 98)

[Go to e-GGRT for GHG Reporting](#)

**Access your AIMRS Companies**

Company	Comp ID	Your Role	Actions
MLH Resources	AIM364	Company Representative	Manage

- Appoint an Alternate Company Representative (ACR) and Delegates

**Company Profile**

Company ID	AIM368	Created Date	10/26/2021
Company Name	MLH Resources	Company Status	
Corporate Address	9 Main St Ode Tine Washington 92043 United States of America (Edit Address)		

**Company Representatives and Delegates**

Role	Name	Date Added	Actions
Company Representative	George Potemkin	10/26/2021	
Alternate Company Representative	none		<a href="#">Appoint</a>

**Add a Delegate**

**Your Company's Facilities**

Facility	Facility ID	Created Date (By)	Last Modified Date (By)	Actions
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**Add a Facility**

**CANCEL**

# AIM: Company Management



## Appoint an ACR

- Enter ACR Nominee's name, phone, and e-mail.
- They will receive an e-mail form [eGGRT@ccdsupport.com](mailto:eGGRT@ccdsupport.com) with an invitation code.
- They must log into e-GGRT and paste the nomination code into the "Accept an Appointment" panel.
- After accepting the nomination, the ACR gains access to all company data
- ACR has the same data access and reporting rights as company representative.

The screenshot shows the EPA AIMRS web interface. At the top left is the EPA logo and "United States Environmental Protection Agency". Navigation tabs include "Home", "Company Management", and "Import Petitions". A user greeting "Hello, George Potemkin" and links for "My Profile" and "Logout" are on the right. The main heading is "MLH Resources" with a breadcrumb trail: "Home » Company Summary » **Appoint ACR**".

A light blue information box contains the following text:

**AIMRS Company Summary**  
Use the form below to appoint an Alternate Company Representative. Complete the required information and click the Send Invitation button. AIMRS will send the appointee an email invitation with instructions on how to login and accept the role. Click the Cancel button if you do not want to proceed with appointing an Alternate Company Representative.

Once this person becomes an Alternate Company Representative they will have access to all AIMRS data for this company, which may include sensitive business information.

Below the box is the "New ACR Information" form with the following fields:

- First Name\*
- Last Name\*
- Phone\*
- Email\*
- Re-enter Email\*

At the bottom of the form are two buttons: "Send Invitation" and "Cancel".

Page footer includes "Paperwork Reduction Act Burden Statement | AIMRS Help" on the left and "AIMRS 21.1.1-j216 | CM-6" on the right.

- Starting in 2024, reclaimers are subject to third-party auditing of their previous year's reports under the HFC Allocation Program.
- Auditors must review:
  - The quantity of regulated substances received for reclamation.
  - A random sample (5 percent or 10, whichever is higher) of records documenting the names and addresses of persons sending them material and the quantity of the material, measured in the combined mass of refrigerant and contaminants, by regulated substance sent to the reclaimer.
  - Records documenting the quantity of regulated HFCs reclaimed.
  - All other reports submitted to the EPA under subpart 84 (e.g., quarterly importer reports).

- An auditor must be a certified public accountant or an accounting firm that is independent of the reporting company.
- All auditor reports must be signed and certified as meeting all applicable requirements of subpart 84.

# AIM: Submitting Third-Party Audit Report



- The auditor must prepare a report and submit their findings electronically to the EPA by **May 31** of the year following the compliance period.
- Additional guidance will be made available on our website for reclaimers and auditors providing instructions on how to conduct the audits and how to electronically submit reports.

- Ensure that the quantities reported for reclaimed and recovered HFCs are identical to figures reported in your annual 608 report.
- Ensure you are reporting the correct refrigerant in your quarterly reports as some refrigerants have similar names (e.g., HFC-134a vs. HFC-134).
- If you have a quarter where no recovery or reclamation took place you are still required to submit a report for that quarterly reporting period.
- Revising submitted reports:
  - Companies can update reports that have been accepted within HAWK.
  - If changes are needed during the Agency's review process, companies will need to resubmit an updated report.



# Questions and Answers

- Section 608 Reporting
  - [Recordkeeping and Reporting Requirements for Stationary Refrigeration](#)
    - Reclamation reporting form
- HFC Allocation Program
  - [HFC Allocation Program Reporting and Recordkeeping webpage](#)
    - Reporting forms
  - [HFC Allocation Rule Reporting Resources](#)
    - Reporting forms
    - Webinar presentation slides
    - Reporting instructions
  - [The EPA's electronic Greenhouse Gas reporting Tool \(e-GGRT\)](#)
  - <https://www.epa.gov/climate-hfcs-reduction/forms/hfc-allocation-rule-reporting-helpdesk> Rule Reporting Help Desk

# 608 Program Managers



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**Thank You**