

# 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.

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:

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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

### Common Errors:

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 or email to Mike James (fax # 202-343-2336/email: james.mike@epa.gov) 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.
2. In “Section 2.2: Company Production Totals”, the Second Party Transformation column (column D) refers to an amount of class I substance that was produced for second 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 Second Party Transformation Report,” is available for entities reporting transformation of class I substances that they did not produce.
3. Likewise, the Second Party Destruction column (column F) of the same section refers to amounts of class I substances that were produced for second 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 Second Party Destruction Report,” is available for entities reporting destruction of class I substances that they did not produce.

Notable Changes: None

## 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 and how the class I substances will be used.

Reporting Frequency: Quarterly

### Common Errors:

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 or email to Mike James (fax # 202-343-2336/email: james.mike@epa.gov) 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.
2. On occasion EPA receives an Importer Quarterly Form with transactions for substances shipped from one of the U.S. Territories. Please note that any shipments of class I substances deriving from U.S. Territories (i.e., Puerto Rico, U.S. Virgin Islands, American Samoa, Guam, or Northern Mariana Islands) are not considered imports.
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 'Heels' or 'Used' class I substances. Rather, Column G should include Essential Uses, In-House Transformation, Second-Party Transformation, In-House Destruction, and Second-Party Destruction. That means that the number provided in column G should total the amounts that are reported in columns B through F.

Notable Changes: None

## Hints for Completing the "Class I Exporter Quarter Report"

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

Reporting Frequency: Quarterly

### Common Errors:

1. On occasion, EPA receives an Exporter Quarterly Report with transactions for substances shipped to one of the U.S. Territories. Please note that any shipments of class I substances to U.S. Territories (i.e., Puerto Rico, U.S. Virgin Islands, American Samoa, Guam, or Northern Mariana Islands) are not considered exports.
2. The revised form includes chemical commodity codes in sections 3A and 3B. Please note, a commodity code must be provided by the reporting entity only when the "other CFC" box is checked.

Notable Changes:

1. Sections 2 and 3 were divided into Sections 2.A and 3.A and 2.B and 3.B to distinguish between reporting information for the Exporter Annual Report and reporting information for the Quarterly A5 (i.e., Article 5) Exporter Report, respectively.

## Hints for Completing the “Notification of Class I Transfers Report”

Purpose: This form is used to capture trades of class I Article 5 Allowances, Essential Use Allowances, or Essential Use CFCs. Please note that an “allowance” (for A5/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.

Common Errors: None

Notable Changes:

1. Section 2 was expanded to include not only Article 5 and Essential Use Allowance transfers (Section 2A), but also Essential Use CFCs (Section 2B). Please fill out the section that pertains to your particular transfer request.

## 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)

Common Errors:

1. Section 5 has been revised to collect data on essential use allowance holders, only. See below, “Notable Changes”, for specific instructions on how to accurately report data in this section.

Notable Changes:

1. Section 5 is now dedicated to collecting essential use allowance holder annual data. It no longer collects annual data for laboratory uses. Lab “totals” data is collected quarterly in Section 4. Laboratory suppliers can include annual total quantities on their memo to EPA transmitting 4th Quarter data.
2. 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.
3. 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.
4. Column D of Section 5 (Amounts on Hand at end of Year (includes pre-1996 amounts)) should only list the amounts of pharma-grade-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 pharma-grade 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.)
5. 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 pharma-grade-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 pharma-grade 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 pharma-grade-CFCs that your company owns.)
6. 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.
7. 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.
8. 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.

9. 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.

Common Errors: NA (EPA does not collect this report.)

Notable Changes: None

### Hints for Completing the “Class I 2<sup>nd</sup> Party Destruction 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 “second” party).

Reporting Frequency: Annually

Common Errors:

1. EPA has found that some companies will submit second-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 would 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. Previously, the form “Annual Report of Second-Party Transformation and Second-Party Destruction” collected data on both transformation and destruction. This form has been divided into two separate reports.

## Hints to Completing the “Class I 2<sup>nd</sup> Party Transformation 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 “second” party).

Reporting Frequency: Annually

### Common Errors:

1. EPA has found that some companies will submit second-party transformation amounts on the producer report, even if they are NOT the producer of the chemical that was transformed. This is not the correct procedure. Only the actual producer of the chemical would indicate, on the Producer Report, the amount that they “produced” for 2nd Party Transformation. The Class I 2nd Party Transformation 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. Previously, the form “Annual Report of Second-Party Transformation and Second-Party Destruction” collected data on both transformation and destruction. This form has been divided into two separate reports.