



Overview

These tips are provided to assist importers or their authorized agents with filing obligations related to imports of bulk hydrofluorocarbons (HFCs) under the American Innovation and Manufacturing (AIM) Act. The following information is included:

- Overview of the regulatory requirements for importing bulk HFCs.
- List of current [Harmonized Tariff Schedule](#) (HTS) codes for HFCs.
- Tips for how to file in the [Automated Commercial Environment](#) (ACE) including examples of documents to upload in the Document Image System (DIS). Tips are provided for:
 - Filing in ACE for bulk HFCs;
 - Filing in ACE for bulk HFCs contained in blends (also referred to as mixtures) and non-objection notices; and
 - Filing in ACE for entering a Foreign Trade Zone (FTZ) or a transshipment.
- Additional resources.

Contact EPA at HFCAllocation@epa.gov if you have questions about whether the HFCs being imported are bulk HFCs. For questions on how to file, refer to your ACE software provider's training and guidance or your U.S. Customs and Border Protection (CBP) client representative. Visit <https://www.epa.gov/climate-hfcs-reduction> for more information on the phasedown of HFCs.

HFCs and the AIM Act

HFCs are fluorinated chemicals commonly used as replacements for ozone-depleting substances (ODS) in refrigeration, air conditioning, aerosols, fire suppression, and foam blowing. HFCs are greenhouse gases with global warming potentials (GWPs) that can be hundreds to thousands of times more potent than carbon dioxide (CO₂). Their use has been rapidly increasing worldwide due to the global phaseout of ODS under the *Montreal Protocol on Substances that Deplete the Ozone Layer* and increased demand for refrigeration and air conditioning.

The AIM Act was enacted on Dec. 27, 2020. The AIM Act directs the U.S. Environmental Protection Agency (EPA) to phase down U.S. production and consumption of HFCs by 85% by the year 2036 through an allowance allocation and trading program.

What are bulk HFCs?

Under 40 CFR 84.3, **bulk** means a regulated substance (i.e., an HFC listed at [Appendix A of 40 CFR part 84](#)) of any amount that is in a container for the transportation or storage of that substance such as cylinders, drums, ISO tanks, and small cans. A regulated substance that must first be transferred from a container to another container, vessel, or piece of equipment in order to realize its intended use is a bulk substance. A regulated substance contained in a manufactured product such as an appliance, an aerosol can, or a foam is not a bulk substance.

As of Jan. 1, 2022, importers of bulk HFCs are required to expend HFC consumption or application-specific allowances at the time of import except for imports for destruction or transformation, or transshipments. For those exceptions, the importer must directly petition (imports for destruction or transformation) or report (transshipments)

to EPA¹ in advance and obtain from EPA a non-objection notice (imports for destruction or transformation) or transshipment confirmation notification (transshipments), in addition to filing imports through ACE.

EPA is working with CBP to develop an improved automated electronic mechanism to support real-time review of HFC imports. To support this automated check, EPA is requiring information, including HTS codes, to be electronically filed through ACE prior to importation.

Reporting Requirements

Per [40 CFR 84.31\(c\)\(7\)](#), EPA requires the following information be electronically filed through ACE consistent with CBP's definitions at 19 CFR 101.1 no later than 14 days prior to importation:

- Cargo Description
- Quantity, Quantity Unit of Measure Code, and Quantity Unit of Measure
- Weight and Weight Unit of Measure
- Port of Entry
- Scheduled Entry Date
- HTS Code and HTS Description
- Origin Country
- Importer Name and Importer Number
- Consignee Entity Name
- CAS Number(s) of the HFC(s) imported and, for HFCs that are in a mixture, either the ASHRAE numerical designation of the refrigerant or the percentage of the mixture containing each HFC
- If importing HFCs for transformation or destruction, a copy of the non-objection notice issued consistent with 40 CFR 84.25
- If importing HFCs as a transshipment, a copy of the confirmation documenting the importer reported the transshipment consistent with 40 CFR 84.31(c)(3)(i)

Harmonized Tariff Schedule (HTS) Codes

The following are HTS codes for HFCs. The correct HTS codes for bulk HFC imports and exports must be used.

Current HTS Codes²

HTS Code	Description/Regulated Substance
2903.41.1000	Trifluoromethane (HFC-23)
2903.42.1000	Difluoromethane (HFC-32)
2903.43.1000	Fluoromethane (HFC-41), 1,2-difluoroethane (HFC-152) and 1,1-difluoroethane (HFC-152a)
2903.44.1010	Pentafluoroethane (HFC-125)
2903.44.1020	1,1,1-trifluoroethane (HFC-143a)
2903.44.1030	1,1,2-trifluoroethane (HFC-143)
2903.45.1000	1,1,1,2-Tetrafluoroethane (HFC-134a) and 1,1,2,2-tetrafluoroethane (HFC-134)
2903.46.1000	1,1,1,2,3,3,3-Heptafluoropropane (HFC-227ea), 1,1,1,2,2,3-hexafluoropropane (HFC-236cb), 1,1,1,2,3,3-hexafluoropropane (HFC-236ea) and 1,1,1,3,3,3-hexafluoropropane (HFC-236fa)
2903.47.1000	1,1,1,3,3-Pentafluoropropane (HFC-245fa) and 1,1,2,2,3-pentafluoropropane (HFC-245ca)
2903.48.0000	1,1,1,3,3-Pentafluorobutane (HFC-365mfc) and 1,1,1,2,2,3,4,5,5,5-decafluoropentane (HFC-4310mee)
3827.51.0000	Mixtures containing halogenated derivatives of methane, ethane or propane: Containing trifluoromethane (HFC-23) or PFCs but not containing CFCs or HCFCs

¹ For more information about required reporting, please visit, <https://www.epa.gov/climate-hfcs-reduction/hfc-allocation-rule-reporting-and-recordkeeping>.

² The HTS codes listed in this fact sheet are valid as of Jan. 27, 2022.

3827.61.0000	Mixtures containing halogenated derivatives of methane, ethane or propane, containing other HFCs but not containing CFCs or HCFCs: Containing 15 percent or more by mass of 1,1,1-trifluoroethane (HFC-143a)
3827.62.0000	Mixtures containing halogenated derivatives of methane, ethane or propane, containing other HFCs but not containing CFCs or HCFCs: Other, not included above, containing 55 percent or more by mass of pentafluoroethane (HFC-125) but not containing unsaturated fluorinated derivatives of acyclichydrocarbons (HFOs)
3827.63.0000	Mixtures containing halogenated derivatives of methane, ethane or propane, containing other HFCs but not containing CFCs or HCFCs: Other, not included above, containing 40 percent or more by mass of pentafluoroethane (HFC-125)
3827.64.0000	Mixtures containing halogenated derivatives of methane, ethane or propane, containing other HFCs but not containing CFCs or HCFCs: Other, not included above, containing 30 percent or more by mass of 1,1,1,2-tetrafluoroethane (HFC-134a) but not containing unsaturated fluorinated derivatives of acyclic hydrocarbons (HFOs)
3827.65.0000	Mixtures containing halogenated derivatives of methane, ethane or propane, containing other HFCs but not containing CFCs or HCFCs: Other, not included above, containing 20 percent or more by mass of difluoromethane (HFC-32) and 20 percent or more by mass of pentafluoroethane (HFC-125)
3827.68.0000	Mixtures containing halogenated derivatives of methane, ethane or propane, containing other HFCs but not containing CFCs or HCFCs: Other, not included above, containing substances of subheadings 2903.41 to 2903.48

Tips when Filing an HFC Import in ACE

Determining Filing Requirements:

If you import bulk HFCs, including HFCs in blends, you will need to file in ACE. If you have questions about whether the HFCs you are importing are bulk HFCs, please contact EPA at HFCAllocation@epa.gov. Information on filing in ACE when HFCs enter an FTZ or are being transhipped through the U.S. is provided in Appendix A (see page 6). Under EPA's HFC requirements, all imports, regardless of value, must be reported no later than 14 days prior to importation. Filers who are importing low value goods can report this information by participating in and filing Type 86 entries with the required information for HFC filings.³

Filing in ACE for Bulk HFCs:

A list of common HFC blends and their HTS codes is included in Appendix B of this fact sheet. Electronic filing is required. We are working on a new HFC reporting solution with CBP that will be available in the future. Until this solution is implemented, you must use the current ODS program in ACE for filing. **You will need to file a Partner Government Agency (PGA) Message Set as described in steps 1-3 and an image of the CAS number(s) as described in step 6. File the PGA Message Set electronically by typing into existing screens in your software and transmit to ACE.**

HFC Allowance Calculator

EPA has developed an HFC allowance calculator to determine how many allowances are needed for an import, as well as the CAS numbers and HTS code for each HFC or HFC blend. The calculator is provided as a downloadable file at <https://go.usa.gov/xt67S>.

1. Use ODS Government Agency Program Code within the PG01 record and the electronic image indicator.
2. File imports of bulk HFC using one of the HTS codes listed in this fact sheet (and flagged for EP1 which is being used for both ODS and HFCs).
3. File with Entry (Cargo Release) or Entry Summary Certified for Cargo Release.
4. If you filed correctly using the ODS program code for one of the listed tariff codes and you have allowances, you will receive a "may proceed." Note: EPA may manually review these filings to ensure that *all* filing and import requirements have been met, and if not, take action.
5. If you received an "under review" there may be one or more issues with your entry potentially including:
 - a. You may not have sufficient allowances to allow for the import.

³ For more information about the ACE Entry Type 86 Test, see the Federal Register Notice, "[Test Concerning Entry of Section 321 Low-Valued Shipments Through Automated Commercial Environment \(ACE\)](#)" (84 FR 40079, Aug. 13, 2019) and [Entry Type 86 Frequently Asked Questions](#).

- b. You may not have provided the appropriate reports or information to EPA and therefore you must correct your EPA message set by following steps 7 and 8 below.
 - c. You may have chosen the wrong program code and therefore you must make a correction to use the ODS program code.
6. In addition to the ODS filing, upload an image in the DIS that contains the CAS number(s). Label the image in the DIS as "EPA_IMPORT_OF_ODS" so EPA can view it.

Additional Steps for Filing in ACE for Bulk HFCs contained in blends and Non-Objection Notices (allowing HFC import for destruction or transformation):

- 7. File the PGA Message Set for the PG01 record that has the ODS Government Agency Program code and the electronic image indicator.
- 8. For HFC blends, in addition to the ODS filing as described in steps 1-3, upload an image in the DIS that contains either the CAS numbers and ASHRAE numerical designation for the blend or the CAS numbers and percentage of the mixture containing each regulated substance. Label the following: (1) Non-Objection Notice (Label as "EPA_NON_OBJECTION_NOTICE"); (2) CAS number(s) and ASHRAE numerical designation; and (3) CAS number(s) and percentage of the mixture containing each regulated substance (Label (2) and (3) as "EPA_IMPORT_OF_ODS"). Examples are provided below.

Tips for Filing the PGA Message Set:

Reminder, make sure you are using the correct Government Program Agency Code for EPA: "ODS" for filing HFCs.

Examples of Documents to Upload in the DIS

Example Non-Objection Notice Received from EPA; Label the image uploaded to the DIS as "EPA_NON_OBJECTION_NOTICE"

John Smith
 AIM UAT ICF Company 10
 6572 Arlington Blvd
 Suite 407
 Falls Church, Virginia 22045

February 18, 2022

Dear Mr. Smith,

This letter serves as a "non-objection notice" by the U.S. Environmental Protection Agency (EPA) in response to your petition received on February 8, 2022 to import regulated hydrofluorocarbons (HFCs) for use in a process resulting in transformation or destruction (Report ID: TDPET_2022_00083_01, Alias: Test100), consistent with the information in the enclosed table (see attached list).

Please inform the EPA of the exact date of the shipment and the name of the vessel once they have been determined. Also, please be advised that this non-objection notice permits AIM UAT ICF Company 10 to import the undermentioned quantity of HFCs as one individual shipment only.

This letter confirms the EPA's receipt of the information required in a petition to import regulated substances, as outlined in 40 CFR 84.25(a)(1). A copy of your petition and this non-objection notice must accompany the shipment through U.S. Customs and Border Protection. In addition, AIM UAT ICF Company 10 must submit a quarterly importer report to EPA, as required per 40 CFR 84.31(c)(1), to report the amounts and types of HFCs imported into the United States.

If new information is brought to the EPA's attention which shows that this non-objection notice was issued based on false or misleading information, the agency has the right to revoke and void the non-objection notice, pursue all means to ensure that the regulated substance is not imported into the United States, take appropriate enforcement actions, and apply administrative consequences.

Non-Objection Notice Attachment		
U.S. Environmental Protection Agency		
Importer:	AIM UAT ICF Company 10	
Report ID:	TDPET_2022_00083_01	
Regulated Substance	HTS Code	Quantity Approved (kg)
HFC-134a	2903.45.1000	234.0
HFC-32	2903.42.1000	468.0
Total Weight of Regulated HFCs in Shipment:		702.0
Unique Container ID(s):	0023423, 234234	
Country of Export:	Canada	
Port of Entry into the United States:	Worcester, Massachusetts - 0403	
Customs Entry Number(s):	abc123456789	
Shipment must arrive before:	February 18, 2023	

Example for Filing CAS Number (Step 6); Label the image uploaded to the DIS as “EPA_IMPORT_OF_ODS”

EPA_IMPORT_OF_ODS	
Chemical Name	CAS Number
HFC-134a	811-97-2

Examples for Filing CAS Numbers or ASHRAE Number for Blends (Step 8); Label the image uploaded to the DIS as “EPA_IMPORT_OF_ODS”

EPA_IMPORT_OF_ODS	
CAS Numbers	Composition
75-10-5	50%
354-33-6	50%

EPA_IMPORT_OF_ODS	
R-410A	
CAS Numbers	
75-10-5	
354-33-6	

For more information on the phasedown of HFCs, visit <https://www.epa.gov/climate-hfcs-reduction>.

Appendix A: Tips when Filing for Entering a Foreign Trade Zone (FTZ) or a Transshipment in ACE

If your HFC shipment is going to enter an FTZ or be transhipped through the U.S., you will need to file in ACE no later than 14 days prior to the shipment arriving at the FTZ or arriving for in-bond entry/transshipment.

1. Upload an image to the DIS that contains the information listed in 40 CFR 84.31(c)(7) including a copy of the confirmation documenting the importer reported the transshipment consistent with 40 CFR 84.31(c)(3)(i), if applicable. An example confirmation notification is provided below.
2. Label the image uploaded to the DIS as “EPA_IMPORT_OF_ODS” so EPA can view it.
3. Include the term “transshipment” or “FTZ” in the document name as applicable.
4. Link the DIS filing to the bill on file.
5. Notify EPA at HFCAllocation@epa.gov when filing FTZ admissions and transshipments through the DIS.

Example Transshipment Confirmation Notification Received from EPA; Label the image uploaded to the DIS as “EPA_IMPORT_OF_ODS”

John Smith
 AIM UAT ICF Company 10
 6572 Arlington Blvd
 Suite 407
 Falls Church, Virginia 22045

March 1, 2022

Dear Mr. Smith,

This letter serves as a “confirmation notice” by the U.S. Environmental Protection Agency (EPA) in response to your notification of intent to tranship hydrofluorocarbons (HFCs) through the United States received on March 1, 2022 (Report ID: HSHIP_2022_00062_01), consistent with the information below.

Importer:	AIM UAT ICF Company 10
Regulated Substance	Quantity (kg)
HFC-134a	25
Total Weight of Regulated HFCs in Shipment:	25
Source Country:	Canada
Intended Port of Entry into the United States:	Worcester, Massachusetts - 0403
Expected Year of Import:	2022

This letter confirms EPA’s receipt of the information required in a notification of transshipment of regulated substances, as outlined in 40 CFR 84.31(c)(3)(i). The regulated substances must be exported within six months of import, and you must notify EPA that the shipment was exported from the United States within 10 working days of the export, per 40 CFR 84.31(c)(3)(ii).

Appendix B: Common HFC Blends and HTS Codes

HTS Code	HTS Code Description	Examples of Common HFC Blends
Chapter 38 – HFC Blends		
Mixtures containing halogenated derivatives of methane, ethane or propane not elsewhere specified or included:		
3827.51.0000	Containing trifluoromethane (HFC-23) or perfluorocarbons (PFCs) but not containing chlorofluorocarbons (CFCs) or hydrochlorofluorocarbons (HCFCs):	R-508A
Containing other hydrofluorocarbons (HFCs) but not containing chlorofluorocarbons (CFCs) or hydrochlorofluorocarbons (HCFCs):		
3827.61.0000	Containing 15 percent or more by mass of 1,1,1-trifluoroethane (HFC-143a)	R-404A R-507A
3827.62.0000	Other, not included in the subheading above, containing 55 percent or more by mass of pentafluoroethane (HFC- 125) but not containing unsaturated fluorinated derivatives of acyclic hydrocarbons (HFOs)	R-421A R-422D
3827.63.0000	Other, not included in the subheadings above, containing 40 percent or more by mass of pentafluoroethane (HFC-125)	R-407A R-410A R-452A
3827.64.0000	Other, not included in the subheadings above, containing 30 percent or more by mass of 1,1,1,2-tetrafluoroethane (HFC-134a) but not containing unsaturated fluorinated derivatives of acyclic hydrocarbons (HFOs)	R-407C
3827.65.0000	Other, not included in the subheadings above, containing 20 percent or more by mass of difluoromethane (HFC-32) and 20 percent or more by mass of pentafluoroethane (HFC-125)	R-448A R-449A
3827.68.0000	Other, not included in the subheadings above, containing substances of subheadings 2903.41 to 2903.48	R-450A R-452B R-454B R-513A

For a more exhaustive list of HFC blends and their HTS codes, download the [HFC Allowance Calculator](#).

Appendix C: Additional Resources

See the following resources for more information related to imports of HFCs under the AIM Act:

- [Final Rule – Phasedown of Hydrofluorocarbons: Establishing the Allowance Allocation and Trading Program Under the American Innovation and Manufacturing Act](#)
- [Frequently Asked Questions – Phasedown of Hydrofluorocarbons Final Rule](#)
- [HFC Allowance Allocations](#)
- [HFC Allowance Calculator](#) (provided as a downloadable file)
- [Fact Sheet – Overview of Requirements for Importers of HFCs](#)
- [HFC Allocation Rule Reporting and Recordkeeping](#)