# Importing ODS and HFCs for Destruction

ODS and HFC Reporting Instructions
November 2021

I. INTRODUCTION

This document provides information for reporting entities on how to submit your certification of intent to import used ozone depleting substances (ODS) and/or petition to import used hydrofluorocarbons (HFCs) for destruction, as required by 40 CFR, Part 82, and Part 84, respectively.[1] A general overview of the submission process is provided in Figure 1 below.

Figure 1: Overview of Submission Process
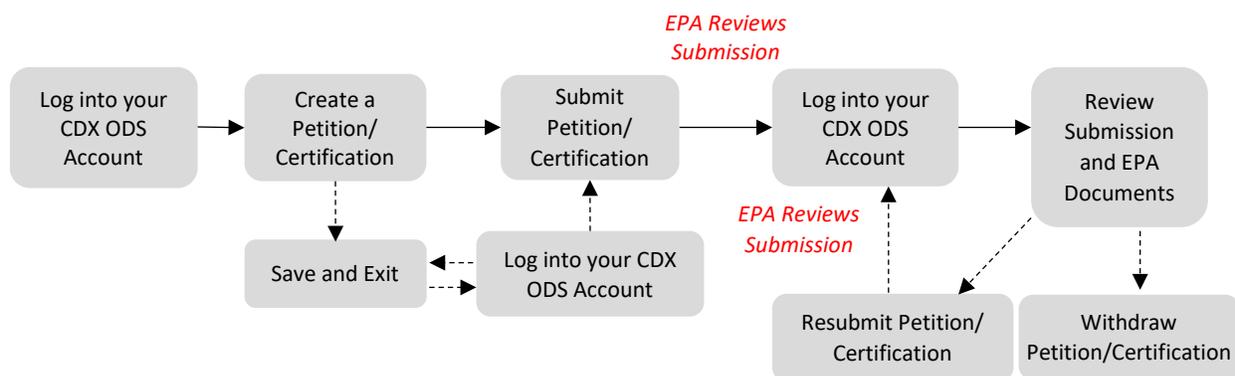
For information on creating a CDX account, see EPA's helpful document on *Registering with CDX,* available for download online at: https://www.epa.gov/ods-phaseout/ozone-depleting-substances-ods-recordkeeping-and-reporting. The remainder of this document is organized as follows:

- **Section II:** Accessing your CDX ODS Account
- **Section III:** Creating a Petition/Certification of Intent
- **Section IV:** Completing a Petition/Certification of Intent
- **Section V:** Viewing Submission and EPA Documents
- **Section VI:** Resubmitting an Incomplete or Denied Petition/Certification
- **Section VII:** Resubmitting an Accepted Petition/Certification
- **Section VIII:** Withdrawing a Petition/Certification
- **Section IX:** Submitting a Destruction Verification

> ## Questions?
>
> For questions about petitions/certifications of intent to import for destruction, email odspetitions@epa.gov.
>
> For questions about CDX, contact the CDX Helpdesk at **(888) 890-1995** or helpdesk@epacdx.net.

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[1] The terminology used for requesting approval from EPA to import used ODS for destruction and used HFCs for destruction is different; however, the reporting requirements and submission process are the same.

II.   ACCESSING YOUR CDX ODS ACCOUNT

Step 1: Log into the Central Data Exchange (CDX)

Visit https://cdx.epa.gov/ and enter your User ID and Password.

Step 2: Enter the ODS Application

From the 'MyCDX' tab, select the "Ozone Depleting Substances" link.

Step 3: Select the Organization under which to Submit your Report

If you are registered under more than one organization in CDX, you will be asked to select under which organization to submit your report. Use the dropdown menu to select the organization name. If you are only registered under one organization, you will be automatically directed to the ODS home page.
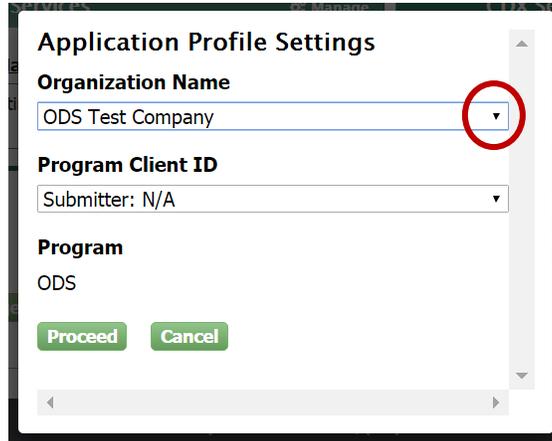
The Importance of your Organization Name

The organization you register with and submit data under in CDX is used by the ODS Tracking System to identify the reporting entity of each submission. CDX assigns each organization in its database with a unique five to seven-digit ID. The use of a consistent Organization ID by all individuals that submit reports on behalf of your company is required by EPA. Additionally, all users registered under the same Organization ID have access to the same Submission History table in CDX. More details on selecting and updating your Organization Name/ID can be found in EPA's document on *Registering with CDX*.

III. CREATING A PETITION/CERTIFICATION OF INTENT

Step 1: Select 'Import Petitions/Certifications'

From the CDX ODS home page, select the "Import Petitions/Certifications" tab of the Submission History table.
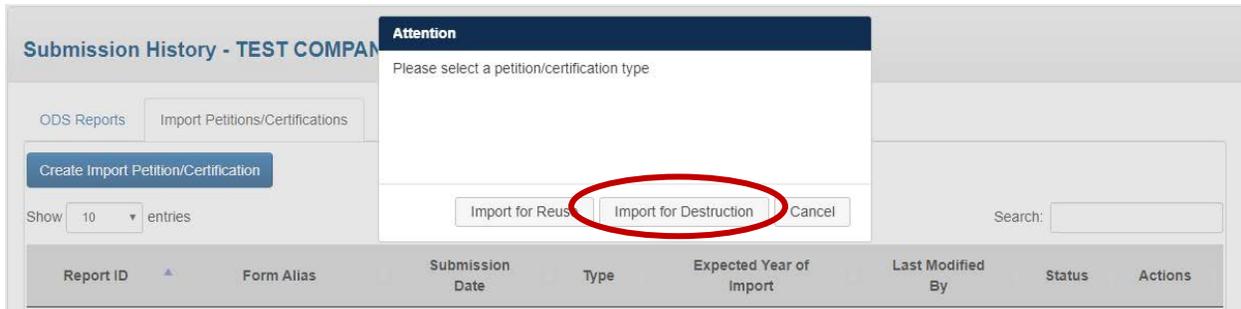

Step 2: Select 'Create Import Petition/Certification'

From the CDX ODS home page, click the "Create Import Petition/Certification" button located above the Submission History table.
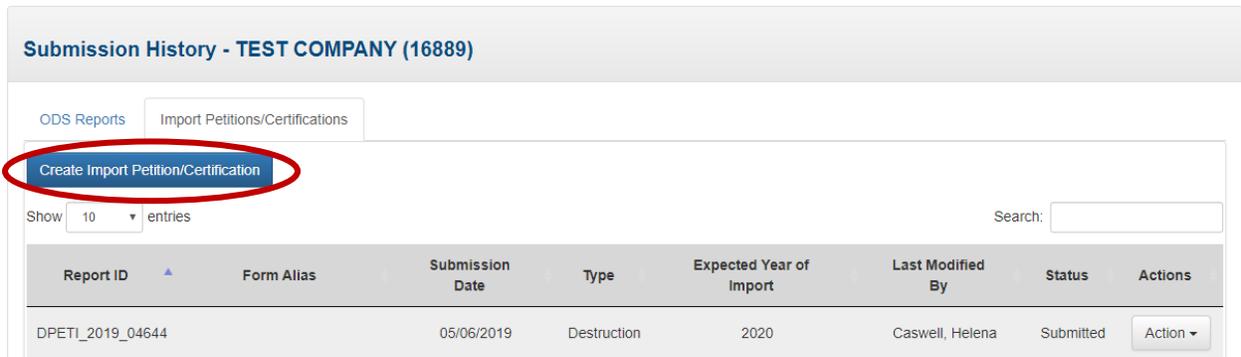
Step 3: Select Import for Destruction

Select "Import for Destruction" from the pop-up menu.

Step 4: Create a Passphrase

Following the instructions, create a passphrase for your new submission and click "Save and Continue."

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What is a Passphrase?

The passphrase is used as an encryption key to protect the contents of your submission. Each time you create a new submission, you will be asked to create a passphrase. In order to edit an 'in progress' submission, resubmit a report, or view the contents of a previous submission (whether it was last modified by you or another CDX user in your organization), you will be required to enter the submission's passphrase. The same passphrase may be used for all submissions. To ensure all users in your organization have access to all historic submissions, you may consider establishing a single passphrase that is used by all CDX users in your organization for all ODS submissions.

REMEMBER YOUR PASSPHRASE: Please note that the system administrator does not have access to your passphrase and cannot retrieve it or reset it. *If you forget your passphrase, you will not be able to view or edit your submission in CDX. If you need to view your submission but forgot your passphrase, contact EPA at* odspetitions@epa.gov.

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Step 5: Enter Importer Information

Enter the importer information for your petition/certification of intent on the "Importer Information" tab. You may select the 'Copy from CDX' link to populate select fields with your CDX profile information. This information can then be edited further, if desired.

Step 6: Provide Destruction Facilities Information

Enter information for the destruction facilities that will receive and destroy the controlled substance(s). If applicable, add contact information for U.S. aggregators by selecting 'Yes' in response to the question at the bottom of the page and adding the contact information of the aggregators. To enter information

for more than one destruction facility or facility/aggregator, select the "**+**" at the end of the appropriate row. Once all information is entered, select "Continue."

Step 7: Enter Shipment Information

Enter the chemicals, quantities, and shipment importer number for each controlled substance to be imported for destruction. For imports of blends, enter the quantity of each ODS and/or HFC blend component separately in the table. To enter information for more than one chemical, select the "**+**" at the end of the row. Select "Continue" to proceed to the next tab.

Step 8: Complete the Import Summary

Review the information in the "Import Summary" tab for accuracy (note that the commodity code is automatically populated based on the chemical name). If any information is incorrect navigate to the previous tabs using either the navigation bar at the top or "Previous" button at the bottom of the page and correct it. Add the corresponding export license (or application/other communication) amount for each chemical listed, if applicable, and upload the supporting document by selecting "Add Document." If the export license/application does not specify a quantity, check the box in the column to the far right to indicate that a quantiy is not listed. You may view or remove documents by selecting the document image or "x" at the end of each row. Once the information is confirmed, select "Continue."

Step 9: Uploads

Upload additional documents and resources, as needed, by selecting "Add Document." If the document is not a photo, select "Other" under Document Type and describe the document type in the 'Document Description' field. You may view or remove documents by selecting the document image or "x" at the end of each row. Once the information is confirmed, select "Submit."

Step 10: Save Progress without Submitting (Optional)

At any time during the submission process, you have the option to save the submission and come back to complete and submit the petition/certification at a later date. If you wish to complete your submission at another time, click the "Save and Exit" button at the bottom of the screen. However, if you "Save and Exit" the form, **remember your passphrase**; the system administrator does not have access to your passphrase and cannot retrieve or reset it. If you forget your passphrase, you will not be able to access or complete your submission. Continue to Section IV for instructions on how to complete your submission.

IV. COMPLETING A PETITION/CERTIFICATION OF INTENT

Step 1: Return to the 'In Progress' Submission (if applicable)

If you decided to "Save and Exit" prior to completing your new petition/certification of intent, locate the 'In Progress' submission in the Submission History table and click on the "Report ID" link.

Step 2: Enter the Submission's Passphrase (if applicable)

Enter the passphrase that was created under Section III, Step 4 and select "Next."

Step 3: Submit your Petition/Certification of Intent

Navigate through the form to confirm all information is correct and that all attachments have been uploaded. Once all information is confirmed, click "Submit" from the "Uploads" tab. Petitions/certifications of intent may not be edited once submitted.

Step 4: Review your Submission

After clicking submit, you will have the option to view a summary of your submission's information by selecting 'View PDF.' If any information is incorrect, click "Cancel" and modify the information, as needed. You also have the option to enter a form alias (i.e., an alternate name to help you track your petitions/certifications). A default alias is automatically populated; you have the option to edit the form alias, as desired. If the information is correct, click "Sign, Encrypt, and Submit."

Step 5: Certify the Accuracy of your Submission

Read the message that appears and, if you agree, select "Accept."
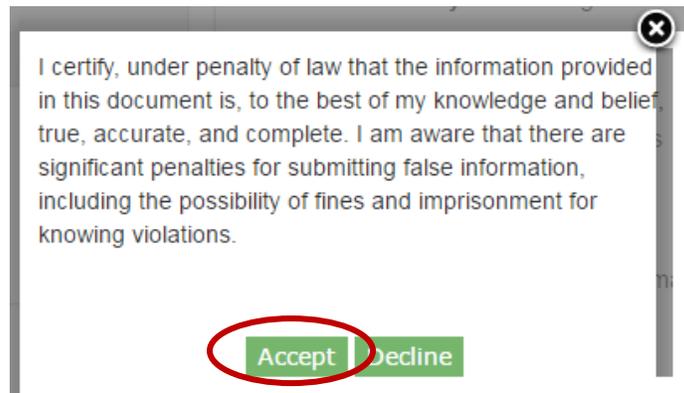
Step 6: Complete the eSignature

- **Re-enter your CDX password.** This is the same password used to log into CDX.
- **Answer the secret question.** The security question will correspond to one of the security questions entered during CDX registration.
- **Sign file.** Select "Sign" to submit your submission.

Step 7: Receive CDX Submission Acknowledgement

Congratulations! You have successfully submitted your petition/certification of intent. An email will be sent by CDX to the submitter's email address to acknowledge receipt of your submission. Retain this email for your records.

Your ODS Submission (DPETI_2020_06402) has been successfully transmitted to EPA and is awaiting processing. Your transaction ID is _bfd37172-3c91-4d27-9272-153537848a1f

Organization Name: TEST COMPANY

If you have questions concerning this message, you may contact the CDX Help Desk by email at helpdesk@epacdx.net or by calling the CDX Technical Support Staff through our toll free telephone support on (888) 890-1995 between Monday through Friday from 8:00 am to 6:00 pm EST/EDT. For International callers, the CDX Help Desk can also be reached at (970) 494-5500.

CDX Homepage

Step 8: Receive CDX Status Change Notification

Once EPA has completed review of your petition/certification of intent, you will receive another email to notify you that the status of your submission has changed. At this time, you may log back into CDX, view the new submission status, and view any documents sent to you by EPA regarding your petition/certification of intent.

V. VIEWING SUBMISSION AND EPA DOCUMENTS

Step 1: Locate the Submission to Review

From the CDX ODS home page, locate the submission for which you would like to review documentation. You may review submission documents for any petition/certification of intent that has been submitted. Once located, click "Action," and select "Review Documents."

Step 2: Enter the Submission's Passphrase

Enter the passphrase that was created under Section III, Step 4, and select "Review Documents."

Step 3: Review Report Documents

Submitted documents include report attachments as well as the Copy of Record, which summarizes all data entered for the submission. To view these files, select the "Download" icon in the column to the far right. In addition to submitted documents, you may also review documents that have been sent to you by EPA following EPA's review of your submission. For more information on what EPA documents to expect, see the text box below on EPA documents.

EPA Documents

Once your submission has been reviewed by EPA, you will receive additional information depending on the outcome of EPA's review. The type of documentation you will see by review outcome is summarized below.

Outcome of EPA Petition/Certification Review	Document Received from EPA
Approved	Non-Objection Letter
Incomplete	Incomplete Notification
Denied	Objection Letter

VI. RESUBMITTING AN INCOMPLETE OR DENIED PETITION/CERTIFICATION

Step 1: Locate the Original Submission

In the Submission History table, locate the petition/certification of intent that you would like to resubmit and click on the Report ID link.

When can I Revise an Incomplete Petition/Certification of Intent?

To revise an incomplete submission, you will need to wait until you receive an email notification that the status of your submission has changed to 'Incomplete.' Submissions identified as 'Incomplete' may be revised and resubmitted at any time following the completion of EPA's review of the petition/certification. If you are aware that you need to amend your submission, but EPA has not yet reviewed your submission, please email odspetitions@epa.gov and EPA will reach out to you to discuss the best path forward.

When can I Resubmit a Denied Petition/Certification of Intent?

To resubmit a petition/certification of intent that has been denied, you must wait until you receive an email notification that the status of your submission has changed to 'Denied.' Petitions/certifications of intent identified as 'Denied' may be resubmitted within 10 working days after receipt of the objection notice.

Step 2: Enter the Submission's Passphrase

Enter the passphrase that was created under Section III, Step 4, and select "Next."

Enter Passphrase

Please enter your passphrase for the submission and click the "Next" button.

Or, you can click "Cancel" to return to the Home page.

Report ID   DPETI_2020_06081

Enter Passphrase   ••••••••••

Next   Cancel

Step 3: Edit Petition/Certification Information

Navigate through the petition/certification of intent and revise the content of the submission and/or upload additional files, as needed, to respond to the feedback provided by EPA in the Objection Letter or Incomplete Notification.

Step 4: Submit your Revised Petition/Certification

Once the petition/certification of intent has been revised, click "Submit" at the bottom of the page. Review your submission's information and "Sign, Encrypt, and Submit" the petition/certification of intent. Refer to Section IV, Steps 4-8 for detailed instructions on completing your resubmission.

Save   Save and Exit   Preview   Validate   Submit   Related Links ▲

VII.   RESUBMITTING AN ACCEPTED PETITION/CERTIFICATION

Accepted petitions/certifications of intent can only be revised to reflect a change in the expected year of import. If other modifications are required, you will need to submit a new petition/certification of intent for review by EPA.

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How long do I have to Import the Material following Receipt of a Non-Objection Notice?

Importers have one year from the date stamped on a non-objection notice for the import to occur. If it is anticipated that the import will not occur within the approved timeframe, the importer may revise the expected year of import and resubmit their petition/certification in CDX for review by EPA.

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Step 1: Locate the Original Submission

In the Submission History table, locate the report that you want to revise and click on the Report ID link.

Step 2: Enter the Submission's Passphrase

Enter the passphrase that was created under Section III, Step 4, and select "Next."

Step 3: Edit Expected Year of Import

On the Importer Information tab, change the "Expected Year of Import." Note that all other fields within the petition/certification of intent are intentionally disabled for editing.

Step 4: Submit your Revised Petition/Certification of Intent

Once the 'Expected Year of Import' has been revised, click "Submit" at the bottom of the page. Review your submission's information and "Sign, Encrypt, and Submit" the petition/certification of intent. Refer to Section IV, Steps 4-8 for detailed instructions on completing your resubmission.

VIII. WITHDRAWING A PETITION/CERTIFICATION

Step 1: Locate the Petition/Certification of Intent to Withdraw

From the CDX ODS home page, locate the petition/certification of intent which you would like to withdraw. Once located, click "Action," and select "Withdraw."

When should I Withdraw a Petition/Certification?

Petitions/certifications of intent may be withdrawn after they have been submitted, reviewed, and 'Accepted' by EPA and a non-objection notice is issued. Petitions/certifications of intent should be withdrawn if the import is no longer expected to take place. Each year, EPA reviews petitioned/certified material against reported imports; therefore, it is important to communicate to EPA when material that was petitioned/certified for import for destruction is no longer expected.

Step 2: Enter the Submission's Passphrase

Enter the passphrase that was created under Section III, Step 4, and select "Withdraw Submission" and then select "Ok."

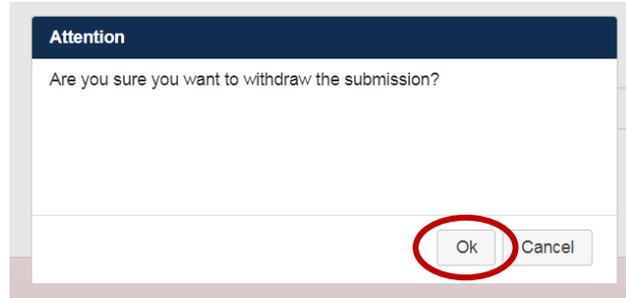## Step 3: Certify the Submission and complete the eSignature

Complete the withdrawal of your petition/certification of intent by certifying the submission and completing the eSignature. Refer to Section IV, Steps 5-8 for detailed instructions on completing your withdrawal. Note that the petition/certification status will appear as 'Submitted' in the Submission History table until EPA reviews and accepts the withdrawal.

IX. SUBMITTING A DESTRUCTION VERIFICATION

For ODS, after the controlled substance(s) have been imported for destruction, please email your destruction verification to odspetitions@epa.gov to verify these materials have been destroyed.

For HFCs, for each individual shipment of a used regulated substance imported for destruction, an importer must submit to EPA records indicating that the substance has been destroyed with their quarterly reports in 84.31(c)(1).