

AIM Act – New reporting and recordkeeping requirements

The following is a summary of new regulations published October 11, 2024 affecting companies that fill, recharge, recycle, and/or service fire suppression equipment containing HFCs. Note that these reporting and recordkeeping requirements are in addition to agent test and recordkeeping requirements which became effective *September 18, 2023 and the reporting requirements for recyclers of fire suppression HFCs which became effective in 2022.*

40 CFR § 84.110(g) Emissions from fire suppression equipment 89 Fed. Reg. 82868 (October 11, 2024)

A. Summary

40 CFR § 84.110(g)

As of **January 1, 2026**, any company that performs first fill of fire suppression equipment, service (*e.g.*, recharge) of fire suppression equipment, and/or recycles HFCs recovered from fire suppression equipment, such as equipment manufacturers, distributors, agent suppliers, or installers that recycle HFCs, must submit a report to EPA annually covering the prior year's activity from January 1 through December 31. The first annual report must be submitted to the Agency on **February 14, 2027**, and subsequent annual reports must be submitted by February 14 of each subsequent year.

As of **January 1, 2026**, companies that employ fire suppression technicians who service, repair, install, or dispose of fire suppression equipment containing HFCs must maintain an electronic or paper copy of the fire suppression technician training used to meet the requirements in paragraph (d). These entities must document that they have provided training to personnel as specified in paragraph (d) of this section and must maintain these records for three years after each training in either electronic or paper format.

As of **January 1, 2026**, owners and operators of fire suppression equipment containing HFCs must maintain records documenting that HFCs are recovered from the fire suppression equipment before it is sent for disposal as specified in paragraph (e) of this section. Such records must be maintained for three years after the relevant equipment is sent for disposal in either electronic or paper format.

B. Text of Regulation

40 CFR § 84.110(g)

(g)(1) As of January 1, 2026, any person who performs first fill of fire suppression equipment, service (*e.g.*, recharge) of fire suppression equipment, and/or recycles regulated substances recovered from fire suppression equipment, such as equipment manufacturers, distributors, agent suppliers, or installers that recycle regulated substances, must submit a report to EPA annually covering the prior year's activity from January 1 through December 31. The first annual report must be submitted to the Agency on February 14, 2027, and subsequent annual reports must be submitted by



February 14 of each subsequent year. Each annual report must be submitted electronically, using the Agency's applicable reporting platform. Each annual report must contain basic identification information (*i.e.*, owner name, facility name, facility address where equipment is located) and the following information for each regulated substance:

- (1) the quantity of material (the combined mass of regulated substance and contaminants) sold for the purpose of installation of new fire suppression equipment and servicing and/or repair of existing fire suppression equipment;
- (2) the quantity of material (the combined mass of regulated substance and contaminants) in inventory onsite for the purpose of installation of new fire suppression equipment and servicing and/or repair of existing fire suppression equipment broken out by recovered, recycled, and virgin;
- (3) the total mass of each regulated substance sold for the purpose of installation of new fire suppression equipment and servicing and/or repair of existing fire suppression equipment;
- (4) the total mass of each regulated substance in inventory onsite for the purpose of installation of new fire suppression equipment and servicing and/or repair of existing fire suppression equipment broken out by recovered, recycled, and virgin; and
- (5) the total mass of waste products the reporting entity sent for disposal, along with information about the disposal facility if waste is not processed by the reporting entity.

A copy of the submitted reports must be maintained for three years in either electronic or paper format. If any entity reports information to EPA under § 84.31(j) that is also required to be reported under this paragraph, to the extent the information reported under § 84.31(j) overlaps with the information that must be reported under this paragraph, in lieu of reporting the same information twice, the entity may refer to the corresponding information reported under § 84.31(j) and explain how it satisfies the reporting requirements in completing the reporting under this paragraph.

(g)(2) As of January 1, 2026, any person who employs fire suppression technicians who service, repair, install, or dispose of fire suppression equipment containing regulated substances must maintain an electronic or paper copy of the fire suppression technician training used to meet the requirements in paragraph (d) of this section and make that copy available to EPA upon request. These entities must document that they have provided training to personnel as specified in paragraph (d) of this section and must maintain these records for three years after each training in either electronic or paper format.

(g)(3) As of January 1, 2026, owners and operators of fire suppression equipment containing regulated substances must maintain records documenting that regulated substances are recovered from the fire suppression equipment before it is sent for disposal as specified in paragraph (e) of this section. Such records must be maintained for three years after the relevant equipment is sent for disposal in either electronic or paper format.



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Questions concerning reporting requirements?

Contact EPA: HFCemissionsReductions@epa.gov

Other useful information:

- *HFC Fire Suppression Agent Test and Reporting Requirements under the AIM Act and EPA Regulations* can be found [here](#)

This FSSA report summarizes updated EPA regulations, effective September 18, 2023, that contain new requirements to verify the quality of HFC fire suppressant agents by laboratory testing as well as additional recordkeeping requirements. These updated regulations affect FSSA members who fill or recharge HFC fire suppression system cylinders.

- *EPA Fact Sheet Fire Suppressant Recycling Under the HFC Allocation Program: Questions and Answers* can be found [here](#)
- *EPA Fact Sheet - Final Rule - Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes under Subsection (h) of the American Innovation and Manufacturing Act* can be found [here](#)