

MEMORANDUM

DATE: September 13, 2024

TO: EPA-HQ-OAR-2022-0606

FROM: Chenise Farquharson

SUBJECT: **Confidentiality Determinations and Emission Data Designations for Data Elements in the Final Rule entitled “Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes under Subsection (h) of the American Innovation and Manufacturing Act of 2020”**

This memo documents the Agency's determination of whether to provide or not provide confidential treatment to individual reported data elements that would be submitted to the Agency or a third-party under its final rule under subsection (h) of the American Innovation and Manufacturing (AIM) Act entitled “Phasedown of Hydrofluorocarbons: Management of Certain Hydrofluorocarbons and Substitutes under Subsection (h) of the American Innovation and Manufacturing Act of 2020.” This document outlines EPA’s determination as to whether an individual data element will be handled as confidential or not confidential. It also notes where the Agency determines that certain categories of information are “emission data” under 40 CFR 2.301(a). The determinations that are being finalized with this rulemaking parallel the proposed determinations for the corresponding data elements, with minor edits for clarity and to correct typographical errors, as well as to clarify the rationale for the final determinations. *See* 88 FR 72216, 72279-72282 (describing proposed determinations for data elements reported to EPA under the leak repair provisions) and *id.* at 72285-72286 (describing proposed determinations for data elements related to fire suppression). Section V of the *Federal Register* notice for the final rule summarizes these determinations. There may be reasons other than business confidentiality protections not to release individual data elements determined to be not entitled to confidential treatment through this rulemaking. For example, the information could reveal personally identifiable information (PII) in certain circumstances, which may be protected disclosure. The Agency will make separate determinations in these instances.

TABLE 1: Determination of confidentiality status for data elements related to reports on chronically leaking appliances¹

Description of data element	Confidentiality Status & Rationale	Rationale
Identification Information (owner or operator, facility name, facility address where appliance is located)	No confidential treatment/Emissions Data	<p>These reports are required for appliances that have leaked 125% or more of their full charge in a calendar year, and thus are inherently reports on emissions of regulated substances. Basic identification information is necessary to interpret these reports and determine the identity of the emissions by the source. Accordingly, EPA considers this “[i]nformation necessary to determine the identity, amount, frequency, concentration . . . of any emission which has been emitted by the source . . .” and therefore “emission data” under 40 CFR 2.301(a)(2)(i)(A). Alternatively, EPA considers this information part of a “general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source)” under 40 CFR 2.301(a)(2)(i)(C).</p> <p>Additionally, this information is not customarily closely held or kept private by companies and is generally readily ascertainable by third parties.</p>
Appliance ID or Description (for facilities with multiple appliances)	No confidential treatment/Emissions Data	These reports are required for appliances that have leaked 125% or more of their full charge in a calendar year, and thus are inherently reports on emissions of regulated substances. For facilities with multiple appliances, the identity of the specific appliance responsible

¹ These reports on chronically leaking appliances would be required under the requirement at 40 CFR 84.106(j). References to “appliances” in Tables 1 & 2 refer to refrigerant-containing appliances as the term is defined in the regulation.

		<p>for the leaks/emissions is necessary to interpret these reports. Accordingly, EPA considers this “[i]nformation necessary to determine the identity, amount, frequency, concentration . . . of any emission which has been emitted by the source . . .” and therefore “emission data” under 40 CFR 2.301(a)(2)(i)(A). Alternatively, this information could be characterized as “[i]nformation necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit,” and therefore “emission data” under 40 CFR 2.301(a)(2)(i)(B), because the regulations countenance some leaks provided that the applicable leak rate is not exceeded or the required leak repair activities are observed. Additionally, EPA considers this information part of a “general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source)” under 40 CFR 2.301(a)(2)(i)(C).</p> <p>Additionally, this information is not customarily closely held or kept private by companies, as the information can typically be viewed or ascertained by someone examining the appliance.</p>
<p>Refrigerant-containing appliance type (comfort cooling or other, IPR, or commercial refrigeration)</p>	<p>No confidential treatment/Emissions Data</p>	<p>These reports are required for appliances that have leaked 125% or more of their full charge in a calendar year, and thus are inherently reports on emissions of regulated substances. Information on appliance type is necessary to understand which leak rate is applicable to the appliance and helps EPA to understand the nature and sufficiency of the repair effort. Accordingly, EPA considers this “[i]nformation necessary to determine the identity, amount, frequency, concentration. . . of any emission which has been emitted by the source . . .” and therefore “emission data” under 40 CFR 2.301(a)(2)(i)(A). Alternatively, this information could be characterized as “[i]nformation necessary to determine the identity, amount, frequency,</p>

		<p>concentration, or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit,” and therefore “emission data” under 40 CFR 2.301(a)(2)(i)(B), because the regulations countenance some leaks provided that the applicable leak rate is not exceeded or the required leak repair activities are observed.</p> <p>Additionally, EPA considers this information part of a “general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source)” under 40 CFR 2.301(a)(2)(i)(C).</p> <p>Additionally, this information is not customarily closely held or kept private by companies and is generally readily ascertainable by third parties based on what they can observe the facility does.</p>
Refrigerant type	No confidential treatment/Emissions Data	<p>These reports are required for appliances that have leaked 125% or more of their full charge in a calendar year, and thus are inherently reports on emissions of regulated substances. Information on refrigerant type is necessary to interpret these reports because it allows EPA to understand the identity of the emissions, the GWP of the refrigerant, and in some cases the applicability of other regulatory controls. Accordingly, EPA considers this “[i]nformation necessary to determine the identity, amount, frequency, concentration . . . of any emission which has been emitted by the source . . .” and therefore “emission data” under 40 CFR 2.301(a)(2)(i)(A). Alternatively, this information could be characterized as “[i]nformation necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit,” and therefore “emission data” under 40 CFR 2.301(a)(2)(i)(B) because the regulations countenance some leaks provided that the applicable leak rate is not exceeded or the</p>

		<p>required leak repair activities are observed. Additionally, EPA considers this information part of a “general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source)” under 40 CFR 2.301(a)(2)(i)(C).</p> <p>Additionally, this information is not customarily closely held or kept private by companies and is generally readily ascertainable by third parties.</p>
Full charge of appliance (pounds)	No confidential treatment/Emissions Data	<p>These reports are required for appliances that have leaked 125% or more of their full charge in a calendar year, and thus are inherently reports on emissions of regulated substances. Information on the full charge is necessary to interpret these reports because it allows EPA to understand the potential amount of emissions from the appliance, and in some cases the applicability of other regulatory controls (e.g., automatic leak detection). Accordingly, EPA considers this “[i]nformation necessary to determine the identity, amount, frequency, concentration . . . of any emission which has been emitted by the source . . .” and therefore “emission data” under 40 CFR 2.301(a)(2)(i)(A). Alternatively, this information could be characterized as “[i]nformation necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit,” and therefore “emission data” under 40 CFR 2.301(a)(2)(i)(B), because the regulations countenance some leaks provided that the applicable leak rate is not exceeded or the required leak repair activities are observed. Additionally, EPA considers this a “general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the</p>

		<p>source)” under 40 CFR 2.301(a)(2)(i)(C).</p> <p>Additionally, this information is not customarily closely held or kept private by companies and generally anyone can roughly estimate the full charge of an appliance based on appliance category.</p>
Annual percent refrigerant loss	No confidential treatment/Emissions Data	<p>These reports are required for appliances that have leaked 125% or more of their full charge in a calendar year, and thus are inherently reports on emissions of regulated substances. Information on the percent refrigerant loss is necessary to interpret these reports because it allows EPA to understand the amount of refrigerant emitted relative to the full charge of the appliance. Accordingly, EPA considers this “[i]nformation necessary to determine the identity, amount, frequency, concentration . . . of any emission which has been emitted by the source . . .” and therefore “emission data” under 40 CFR 2.301(a)(2)(i)(A). Alternatively, this information could be characterized as “[i]nformation necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit,” and therefore “emission data” under 40 CFR 2.301(a)(2)(i)(B), because the regulations countenance some leaks provided that the applicable leak rate is not exceeded or the required leak repair activities are observed.</p> <p>Additionally, this percentage loss information is not customarily closely held or kept private by companies.</p>
Dates of refrigerant addition	No confidential treatment/Emissions Data	<p>These reports are required for appliances that have leaked 125% or more of their full charge in a calendar year, and thus are inherently reports on emissions of regulated substances. Information on the amount of refrigerant added and the dates the addition took place allows EPA to determine whether the owner/operator was regulatorily required to repair the appliance and the deadline for such repair. This</p>

		<p>also allows EPA to understand the amount of refrigerant emitted relative to the full charge of the appliance. Accordingly, EPA considers this “[i]nformation necessary to determine the identity, amount, frequency, concentration . . . of any emission which has been emitted by the source . . .” and therefore “emission data” under 40 CFR 2.301(a)(2)(i)(A). Alternatively, this information could be characterized as “[i]nformation necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit,” and therefore “emission data” under 40 CFR 2.301(a)(2)(i)(B), because the regulations countenance some leaks provided that the applicable leak rate is not exceeded or the required leak repair activities are observed.</p> <p>Additionally, dates of this nature are not information that is customarily closely held or kept private by companies.</p>
Amounts of refrigerant added	No confidential treatment/Emissions Data	<p>These reports are required for appliances that have leaked 125% or more of their full charge in a calendar year, and thus are inherently reports on emissions of regulated substances. Information on the amount of refrigerant added and the dates the addition took place allows EPA to determine whether the owner/operator was regulatorily required to repair the appliance and the deadline for such repair. This also allows EPA to understand the amount of refrigerant emitted relative to the full charge of the appliance. Accordingly, EPA considers this “[i]nformation necessary to determine the identity, amount, frequency, concentration . . . of any emission which has been emitted by the source . . .” and therefore “emission data” under 40 CFR 2.301(a)(2)(i)(A). Alternatively, this information could be characterized as “[i]nformation necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit,”</p>

		<p>and therefore “emission data” under 40 CFR 2.301(a)(2)(i)(B), because the regulations countenance some leaks provided the applicable leak rate is not exceeded or the required leak repair activities are observed.</p> <p>Additionally, this information is not customarily closely held or kept private by companies, as EPA anticipates that it is not considered commercially valuable information.</p>
Date of last successful follow-up verification test	No confidential treatment/Emissions Data	<p>These reports are required for appliances that have leaked 125% or more of their full charge in a calendar year, and thus are inherently reports on emissions of regulated substances. Information on the date of the last successful follow-up verification test allows EPA to confirm compliance with regulatorily required repair and verification requirements, which are designed to reduce the overall emissions of the appliance below the applicable leak rate threshold. Accordingly, EPA considers this “[i]nformation necessary to determine the identity, amount, frequency, concentration . . . of any emission which has been emitted by the source . . .” and therefore “emission data” under 40 CFR 2.301(a)(2)(i)(A). Alternatively, this information could be characterized as “[i]nformation necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit,” and therefore “emission data” under 40 CFR 2.301(a)(2)(i)(B), because the regulations countenance some leaks provided that the required leak repair activities, including a successful follow-up verification test, are observed.</p> <p>Additionally, dates of this nature are not information customarily closely held or kept private by companies.</p>
Explanation of cause of refrigerant losses (Narrative)	No confidential treatment/Emissions	<p>These reports are required for appliances that have leaked 125% or more of their full charge in a calendar year, and thus are inherently</p>

	Data	<p>reports on emissions of regulated substances. An explanation of the cause of the refrigerant loss allows EPA to understand the nature, amount, and/or frequency of the emissions and if better controls or practices may have avoided them. Accordingly, EPA considers this “[i]nformation necessary to determine the identity, amount, frequency, concentration . . . of any emission which has been emitted by the source . . .” and therefore “emission data” under 40 CFR 2.301(a)(2)(i)(A). Alternatively, this information could be characterized as “[i]nformation necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit,” and therefore “emission data” under 40 CFR 2.301(a)(2)(i)(B), because the regulations countenance some leaks provided that the required leak repair activities are observed and because this information also helps EPA to confirm that required leak inspections took place.</p> <p>Additionally, this information is not customarily closely held or kept private by companies. This information does not provide insight into facility processes or operation. Causes of refrigerant leaks can be broadly categorized (e.g., failure of a particular component, employee error, etc.). Common causes of leaks are well understood by technicians and narrative responses would not contain information regarding the customization of an appliance to the extent the owner considers that customization proprietary.</p>
Description of the repair actions taken (Narrative)	No confidential treatment/Emissions Data	<p>These reports are required for appliances that have leaked 125% or more of their full charge in a calendar year, and thus are inherently reports on emissions of regulated substances. An explanation of the repair actions taken allows EPA to confirm regulatory compliance and the nature, amount and/or frequency of the emissions that predicated the repair. Accordingly, EPA considers this “[i]nformation necessary to determine the identity, amount, frequency, concentration . . . of any</p>

		<p>emission which has been emitted by the source . . .” and therefore “emission data” under 40 CFR 2.301(a)(2)(i)(A). Alternatively, this information could be characterized as “[i]nformation necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit,” and therefore “emission data” under 40 CFR 2.301(a)(2)(i)(B), because the regulations countenance some leaks provided that the required leak repair activities are observed and because this information would help EPA to confirm that required repair activities took place.</p> <p>Additionally, this information is not customarily closely held or kept private by companies. This information does not provide insight into facility processes or operation. Repair methods can be categorized broadly (e.g., replacement of a specific component part and leak testing, etc.). Common repair methods are well understood by technicians and narrative responses would not contain information regarding the customization of an appliance to the extent the owner considers that customization proprietary.</p>
<p>Whether a retrofit or retirement plan has been developed for the appliance, and, if so, the anticipated date of retrofit or retirement</p>	<p>No confidential treatment/Emissions Data</p>	<p>These reports are required for appliances that have leaked 125% or more of their full charge in a calendar year, and thus are inherently reports on emissions of regulated substances. These reports would include information related to the identity of the refrigerant and the schedule for the retrofit or retirement, if applicable (retrofits would include repairs of leaks). Thus, information in this report allows EPA to understand emissions from the appliance that have occurred and would be likely to occur before the plan was completed. Accordingly, EPA considers this “[i]nformation necessary to determine the identity, amount, frequency, concentration . . . of any emission which has been emitted by the source . . .” and therefore “emission data” under 40 CFR 2.301(a)(2)(i)(A). Alternatively, this information could be characterized as “[i]nformation necessary to determine the identity,</p>

		<p>amount, frequency, concentration, or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit,” and therefore “emission data” under 40 CFR 2.301(a)(2)(i)(B), because the regulations countenance some leaks provided that the required leak repair activities are observed and in some circumstances the required leak repair activities would include preparation of a retrofit or retirement plan.</p> <p>Additionally, this information is not customarily closely held or kept private by companies. This information is a yes/no and a date, and this does not reveal anything about facility processes, operation, or—in the case of industrial process refrigeration—production volume. Additionally, if a retrofit or retirement is scheduled, that fact is likely readily ascertainable by third parties because the regulated entity would necessarily be purchasing a replacement and engaging a technician to perform the retrofit or replacement.</p>
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TABLE 2: Determination of confidentiality status for data elements related to other leak repair notifications and extension requests

Description of data element	Confidentiality status	Rationale
Extension of time to complete repairs; Identification and address of the facility; the name of the owner or operator of the refrigerant-containing appliance; the leak rate; the method used to determine the leak rate and full charge; the date the refrigerant-containing appliance exceeded the applicable leak rate; the location of leak(s) to the extent determined to date; any repairs	No confidential treatment/Emissions Data	Under a limited set of circumstances, the regulations provide for extensions to the time frame for regulatorily required repairs to occur. During this time, the regulations do not prohibit an owner/operator for operating an appliance while it is leaking, and they do not prohibit adding additional refrigerant to that appliance. Thus, the information in these extension requests allows EPA to determine the identity of a leaking appliance as well as the rate of the leak and location of the leak(s). Accordingly, EPA considers this

<p>that have been performed thus far, including the date that repairs were completed; the reasons why more than 30 days (or 120 days if an industrial process shutdown is required) are needed to complete the repairs; and an estimate of when the repairs will be completed. If the estimated completion date is to be extended, a new estimated date of completion and documentation of the reason for that change must be submitted to EPA within 30 days of identifying that the completion date must be extended.</p>		<p>“[i]nformation necessary to determine the identity, amount, frequency, concentration . . . of any emission which has been emitted by the source . . .” and therefore “emission data” under 40 CFR 2.301(a)(2)(i)(A). Alternatively, this information could be characterized as “[i]nformation necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit,” and therefore “emission data” under 40 CFR 2.301(a)(2)(i)(B) because the regulations countenance some leaks provided that the required leak repair activities are observed.</p> <p>Additionally, this timeframe information is not customarily closely held or kept private by companies.</p>
<p>Relief from the obligation to retrofit or retire a refrigerant-containing appliance: The date that the requirement to develop a retrofit or retirement plan was triggered; the leak rate; the method used to determine the leak rate and full charge; the location of the leak(s) identified in the leak inspection; a description of the repairs that have been completed; a description of repairs that have not been completed; a description of why repairs were not conducted within the applicable time frame; and a statement signed by an authorized company official that all identified leaks will be repaired and an estimate of when those repairs will be completed (not</p>	<p>No confidential treatment/Emissions Data</p>	<p>The regulations would require the retrofit or retirement of an appliance that has been leaking over the applicable leak rate threshold if that appliance is not repaired within the required time window. If the appliance is subsequently repaired such that it is no longer leaking at or above the applicable leak rate threshold, the owner/operator can submit a request to be relieved from the obligation to retrofit or retire the appliance. The information in these requests allows EPA to confirm the appliance has been repaired such that it is no longer leaking above the leak rate threshold before relieving the owner/operator of the obligation to retrofit or retire that appliance. Accordingly, EPA considers this “[i]nformation necessary to determine the identity, amount, frequency, concentration . . . of any emission which has been emitted by the source . . .” and therefore “emission data” under 40 CFR 2.301(a)(2)(i)(A). Alternatively, this information could be characterized as “[i]nformation necessary to determine the identity, amount, frequency, concentration, or</p>

<p>to exceed one year from date of the plan).</p>		<p>other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit,” and therefore “emission data” under 40 CFR 2.301(a)(2)(i)(B) because the regulations countenance some leaks provided that the required leak repair activities are observed.</p> <p>Additionally, this timeframe information is not customarily closely held or kept private by companies.</p>
<p>Extension of time to complete the retrofit or retirement of a refrigerant-containing appliance: Identification of the refrigerant-containing appliance; name of the owner or operator; the leak rate; the method used to determine the leak rate and full charge; the date the refrigerant-containing appliance exceeded the applicable leak rate; the location of leak(s) to the extent determined to date; any repairs that have been finished thus far, including the date that repairs were finished; a plan to finish the retrofit or retirement of the refrigerant-containing appliance; the reasons why more than one year is necessary to retrofit or retire the appliance; the date of notification to EPA; and an estimate of when retrofit or retirement work will be finished.</p>	<p>No confidential treatment/Emissions Data</p>	<p>The regulations would require the retrofit or retirement of an appliance that has been leaking over the applicable leak rate threshold if that appliance is not repaired within the required time window. Under certain circumstances, owner/operators may request an extension of the time allotted to complete a retrofit or retirement. During that time, the owner/operator can continue to operate an appliance even though it may be leaking above the leak rate threshold. The information contained in these extension requests allows EPA to understand the level of emissions (leaks) and the circumstances that warrant an extended retrofit or retirement scheduled. Accordingly, EPA considers this “[i]nformation necessary to determine the identity, amount, frequency, concentration . . . of any emission which has been emitted by the source . . .” and therefore “emission data” under 40 CFR 2.301(a)(2)(i)(A). Alternatively, this information could be characterized as “[i]nformation necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit,” and therefore “emission data” under 40 CFR 2.301(a)(2)(i)(B) because the regulations countenance some leaks provided that the required</p>

		<p>leak repair activities are observed.</p> <p>Additionally, this timeframe information is not customarily closely held or kept private by companies.</p>
<p>Notification of exclusion of purged refrigerants that are destroyed from annual leak rate calculations: The identification of the facility and a contact person, including the address and telephone number; a description of the refrigerant-containing appliance, focusing on aspects relevant to the purging of refrigerant and subsequent destruction; a description of the methods used to determine the quantity of refrigerant sent for destruction and type of records that are being kept by the owners or operators where the appliance is located; the frequency of monitoring and data-recording; and a description of the control device, and its destruction efficiency.</p>	<p>No confidential treatment/Emissions Data</p>	<p>The regulation provides that in calculating annual leak rates, purged refrigerant that is destroyed at a verifiable destruction efficiency would not be counted toward the leak rate. The information in these notifications is used to confirm that refrigerant that is excluded as “purged refrigerant” has been destroyed rather than emitted. Accordingly, EPA considers this “[i]nformation necessary to determine the identity, amount, frequency, concentration . . . of any emission which has been emitted by the source . . .” and therefore “emission data” under 40 CFR 2.301(a)(2)(i)(A).</p> <p>Alternatively, this information could be characterized as “[i]nformation necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit,” and therefore “emission data” under 40 CFR 2.301(a)(2)(i)(B) because the regulations countenance some leaks provided that the required leak repair activities are observed.</p> <p>Additionally, this notice information is not customarily closely held or kept private by companies.</p>

TABLE 3: Determination of confidentiality status for data elements related to reports on fire suppression

Description of data element	Confidentiality Status	Rationale
<p>Identification Information (owner name, facility name, facility address where equipment is located)</p>	<p>No confidential treatment/ Emissions Data</p>	<p>Basic identification information is necessary to interpret reports submitted by these entities and determine the identity of the emissions by the source. Accordingly, EPA considers this “[i]nformation necessary to determine the identity, amount, frequency, concentration . . . of any emission which has been emitted by the source . . .” and therefore “emission data” under 40 CFR 2.301(a)(2)(i)(A). Alternatively, EPA considers this information part of a “general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source)” under 40 CFR 2.301(a)(2)(i)(C).</p> <p>Additionally, EPA does not anticipate that this information would provide insight into facility processes or operation. EPA also does not anticipate that facilities keep this information private or secure. Accordingly, this information is not customarily closely held or kept private by companies.</p>

<p>For each regulated substance, 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</p>	<p>No confidential treatment/ Emissions Data</p>	<p>EPA does not anticipate that this inventory information would provide insight into facility processes or operation. EPA also does not anticipate that facilities keep this information private or secure. Accordingly, this information is not customarily closely held or kept private by companies.</p> <p>Additionally, this information is necessary to determine the identity, amount, frequency, or concentration of emissions related to fire suppression sources, and therefore EPA considers it “emission data” under 40 CFR 2.301(a)(2)(i).</p>
<p>For each regulated substance, 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</p>	<p>No confidential treatment/ Emissions Data</p>	<p>EPA does not anticipate that this inventory information would provide insight into facility processes or operation. EPA also does not anticipate that facilities keep this information private or secure. Accordingly, this information is not customarily closely held or kept private by companies.</p> <p>Additionally, this information is necessary to determine the identity, amount, frequency, or concentration of emissions related to fire suppression sources, and therefore EPA considers it “emission data” under 40 CFR 2.301(a)(2)(i).</p>
<p>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</p>	<p>No confidential treatment/ Emissions Data</p>	<p>EPA does not anticipate that this inventory information would provide insight into facility processes or operation. EPA also does not anticipate that facilities keep this information private or secure. Accordingly, this information is not customarily closely held or kept private by companies.</p> <p>Additionally, this information is necessary to determine the identity, amount, frequency, or concentration of emissions related to fire suppression sources, and therefore EPA considers it “emission data” under 40 CFR 2.301(a)(2)(i).</p>

<p>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</p>	<p>No confidential treatment/ Emissions Data</p>	<p>EPA does not anticipate that this inventory information would provide insight into facility processes or operation. EPA also does not anticipate that facilities keep this information private or secure. Accordingly, this information is not customarily closely held or kept private by companies.</p> <p>Additionally, this information is necessary to determine the identity, amount, frequency, or concentration of emissions related to fire suppression sources, and therefore EPA considers it “emission data” under 40 CFR 2.301(a)(2)(i).</p>
<p>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</p>	<p>No confidential treatment/ Emissions Data</p>	<p>EPA does not anticipate that this inventory information would provide insight into facility processes or operation. EPA also does not anticipate that facilities keep this information private or secure. Accordingly, this information is not customarily closely held or kept private by companies.</p> <p>Additionally, this information is necessary to determine the identity, amount, frequency, or concentration of emissions related to fire suppression sources, and therefore EPA considers it “emission data” under 40 CFR 2.301(a)(2)(i).</p>