# **ODS REPORTING**

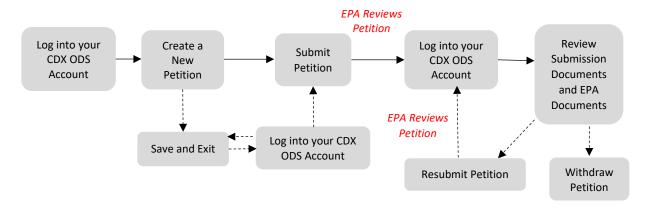
# Petitioning EPA to Import Used ODS for Reuse

**April 2020** 

### I. INTRODUCTION

This document provides information for reporting entities on how to petition the Environmental Protection Agency (EPA) to import used ozone depleting substances (ODS), as required by 40 CFR Part 82. A general overview of the submission process is provided in Figure 1 below.

**Figure 1: Overview of Petitioning Process** 



For information on creating a CDX account, see EPA's document on *Registering with CDX*. The remainder of this document is organized as follows:

- Section II: Accessing your CDX ODS Account
- Section III: Creating a New Import Petition For Reuse
- Section IV: Completing a New Import Petition for Reuse
- Section V: Viewing Submission Documents and EPA Documents
- Section VI: Resubmitting an Incomplete or Denied Petition
- Section VII: Resubmitting an Accepted Petition
- Section VIII: Withdrawing a Petition

### **Questions?**

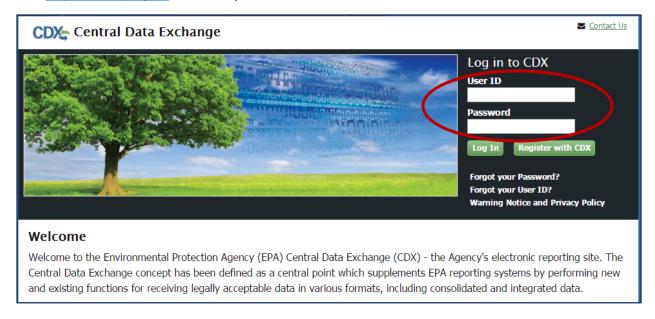
For questions about petitioning, email odspetitions@epa.gov.

For questions about CDX, contact the CDX Helpdesk at **(888) 890-1995** or <a href="mailto:helpdesk@epacdx.net">helpdesk@epacdx.net</a>.

### II. ACCESSING YOUR CDX ODS ACCOUNT

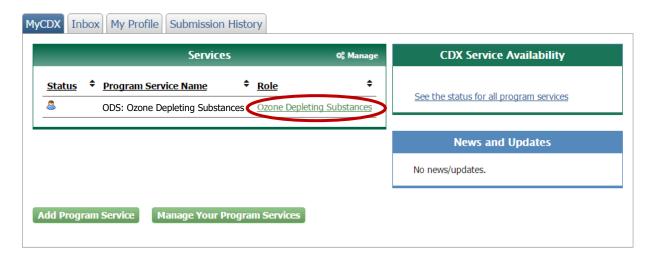
# Step 1: Log into the Central Data Exchange (CDX)

Visit <a href="https://cdx.epa.gov/">https://cdx.epa.gov/</a> and enter your User ID and Password.



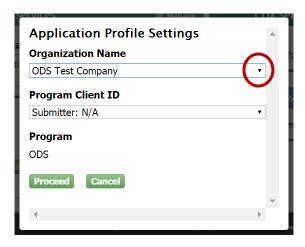
# **Step 2: Enter the ODS Application**

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 NEW IMPORT PETITION FOR REUSE

# Step 1: Select 'Import Petitions/Certifications'

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



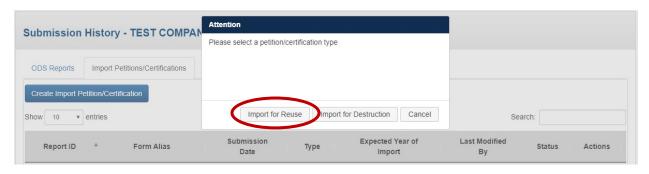
# Step 2: Select 'Create Import Petition/Certification'

From the CDX ODS home page, click the "Create Import Petition/Certification" button located above the Submission History table.



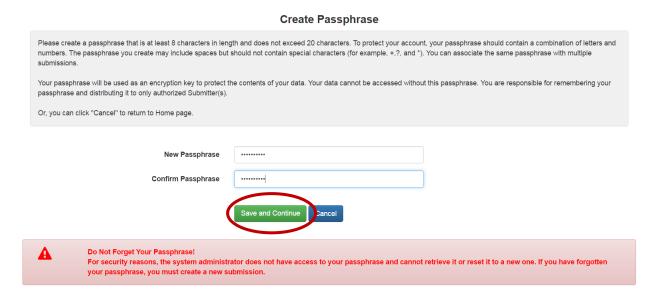
# **Step 3: Select Import for Reuse**

Select "Import for Reuse" 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."



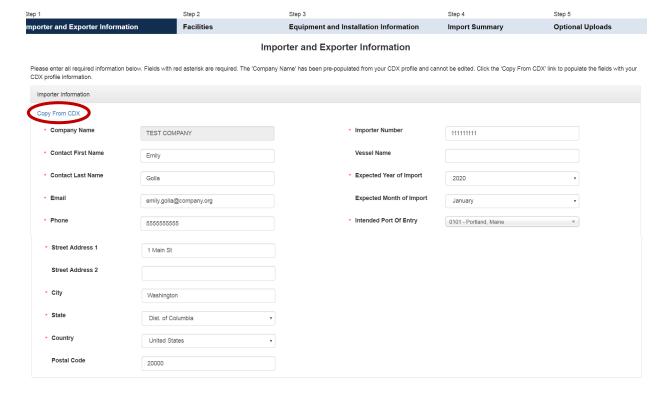
## What is a Passphrase?

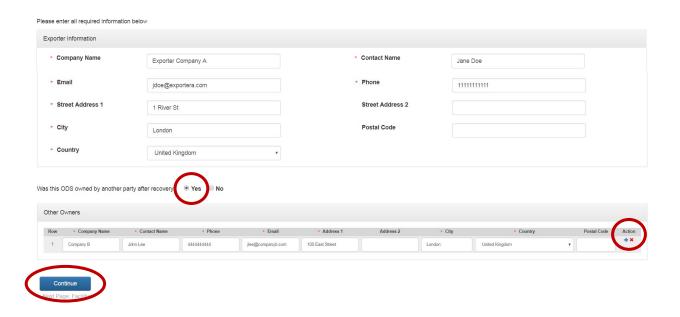
The passphrase is used as an encryption key to protect the contents of your submission. Each time you create a new submission, you will be asked to create a passphrase. In order to edit an 'in progress' submission, resubmit a report, or view the contents of a previous submission (whether it was last 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.* 

## **Step 5: Enter Importer and Exporter Information**

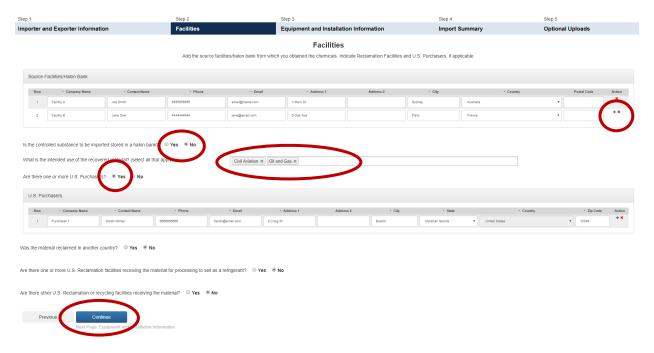
Enter the importer and exporter information for your new ODS petition on the "Importer and Exporter Information" tab. You may select the 'Copy from CDX' link to populate select fields with your CDX profile information. This information can then be edited further, if desired. If the ODS was owned by another party after recovery, select 'Yes' in response to the question at the bottom of the page and add the contact information of the organization(s). To enter information for more than one organization, select the "+" at the end of the row. Once all information is entered, select "Continue."





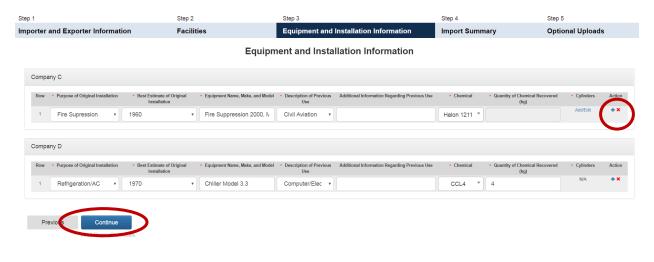
# Step 6: Enter Facilities/Halon Bank Information

Enter information for the source facilities or halon bank from which you obtained the ODS material and select all intended uses of the recovered material. Clarify whether the material to be imported is stored in a halon bank by selecting 'Yes' in response to the question below the table. If applicable, add contact information for Reclamation Facilities and U.S. Purchasers by selecting 'Yes' in response to the questions at the bottom of the page and adding the contact information of the facilities and/or purchasers. To enter information for more than one facility/purchaser, select the "+" at the end of the appropriate row. Once all information is entered, select "Continue."



### **Step 7: Enter Equipment Installation Information**

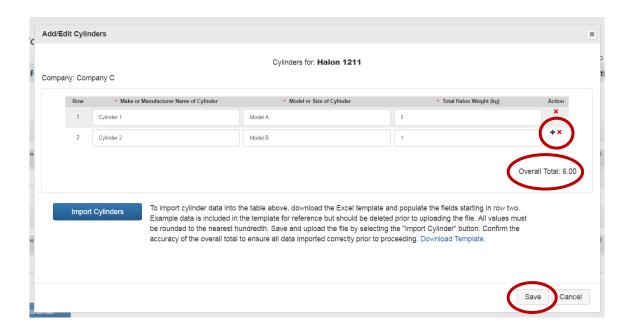
Enter equipment installation information for each source facility identified under Step 2. If the material to be import is stored in a halon bank, enter only data on the chemical and quantity. To enter information for more than one piece of equipment at a given facility, select the "+" at the end of the row. If you are petitioning to import used halon from a source facility, cylinder information should be provided. Continue to Step 7a for additional instructions on entering cylinder information. Once all information is entered, select "Continue."



# **Step 7a: Enter Cylinder Information**

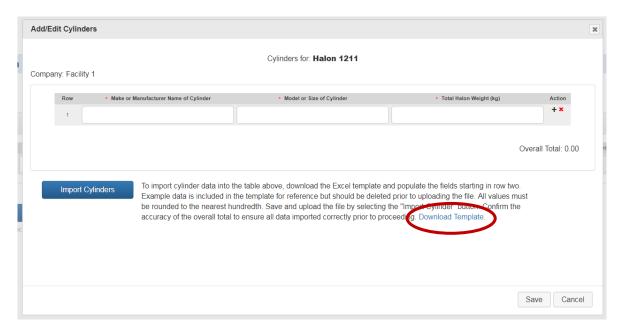
For halon chemicals not obtained from a halon bank, you should provide information on the cylinders that the material was sourced from. Select the "Add/Edit" link under Cylinders and enter the information for each cylinder in the table. To add rows, select the "+" at the end of the row. Alternatively, you may import this information into the table using the Excel template provided. Refer to Step 7b for additional instructions on using the Excel template. Once all cylinder information is entered, confirm the overall total is correct and select "Save."

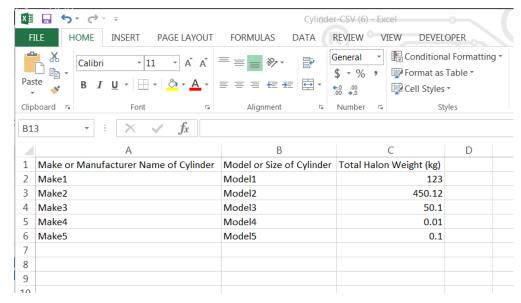


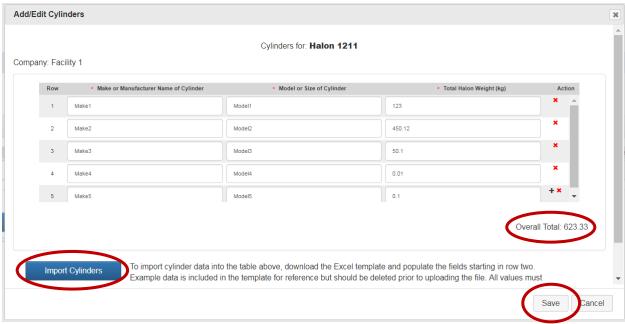


# **Step 7b: Import Cylinder Information**

Select "Download Template" to download the template for the cylinder data. Note that dummy data is contained within the template for reference. Delete the dummy data and enter your cylinder information. Save the file to your computer. Select "Import Cylinders" to select and import the file. Confirm the overall total is correct and select "Save."

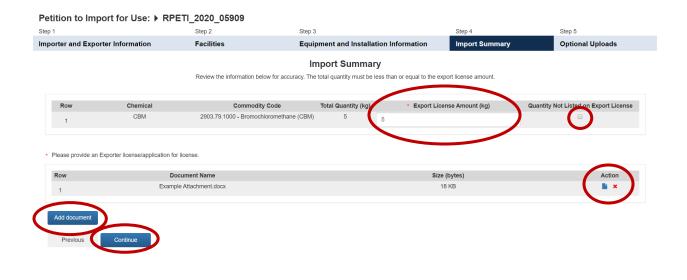






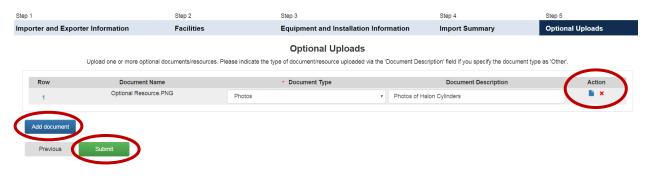
## **Step 8: Complete the Import Summary**

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, if applicable, for each chemical listed 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 quantity 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: Optional Uploads**

Upload additional documents and resources, as needed, by selecting "Add Document." If the document is not a photo or internal transfer document, select "Other" under Document Type and describe the document type under 'Document Description.' 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)**

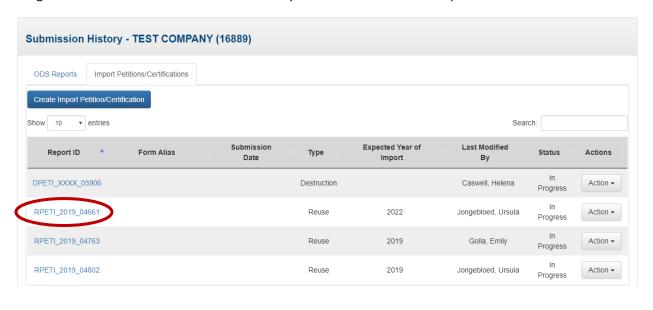
At any time during the submission process, you have the option to save the submission and come back to complete and submit the petition at a later date. If you wish to complete your submission at another time, click the "Save and Exit" button at the bottom of the screen. However, if you "Save and Exit"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



### IV. COMPLETING A NEW IMPORT PETITION FOR REUSE

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

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



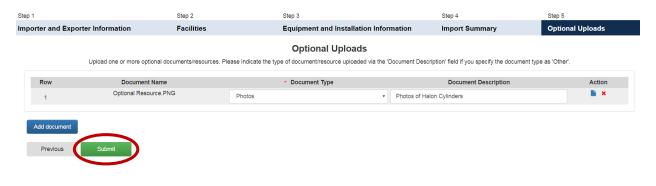
# Step 2: Enter the Submission's Passphrase (if applicable)

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



### **Step 3: Submit your Petition**

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 "Optional Uploads" tab. Petitions may not be edited once submitted.



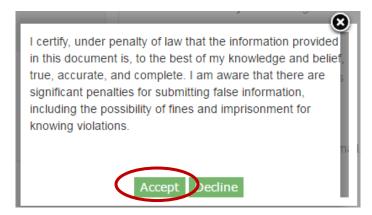
## **Step 4: Review your Submission**

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 import petition. 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 (RPETI\_2020\_06423) has been successfully transmitted to EPA and is awaiting processing. Your transaction ID is  $\_c01c4099-33b5-4b30-8add-4f5b4d835968$ 

Organization Name: TEST COMPANY

If you have questions concerning this message, you may contact the CDX Help Desk by email at <a href="helpdesk@epacdx.net">helpdesk@epacdx.net</a> 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** 

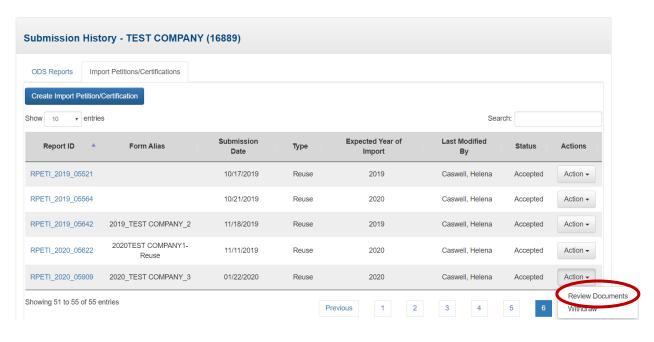
## **Step 8: Receive CDX Status Change Notification**

Once EPA has completed review of your petition, 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.

### V. VIEWING SUBMISSION DOCUMENTS AND EPA DOCUMENTS

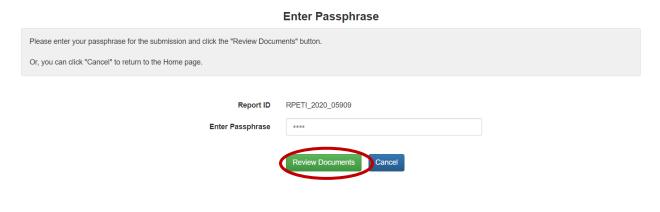
## Step 1: Locate the Petition to Review

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



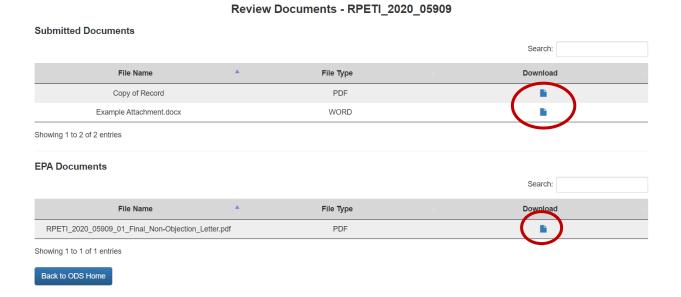
# Step 2: Enter the Submission's Passphrase

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 petition. For more information on what EPA documents to expect, see the text box below on EPA documents.



#### **EPA Documents**

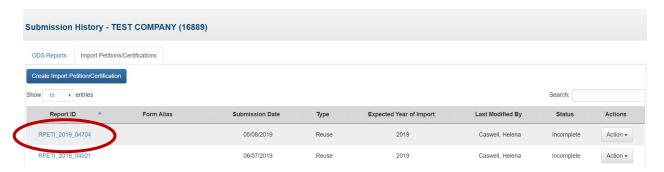
Once your submission has been reviewed by EPA, you will receive additional information depending on the outcome of EPA's review. The type of documentation you will see by review outcome is summarized below.

Document Received from EPA
Non-Objection Letter
Incomplete Notification
Objection Letter

### VI. RESUBMITTING AN INCOMPLETE OR DENIED PETITION

# **Step 1: Locate the Original Submission**

In the Submission History table, locate the report that you would like to resubmit and click on the Report ID link.



## When can I Revise an Incomplete Petition?

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

#### When can I Re-Petition a Denied Petition?

To re-petition a petition that has been denied, you must wait until you receive an email notification that the status of your petition has changed to 'Denied.' Petitions identified as 'Denied' may be repetitioned 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 "Review Documents."



## **Step 3: Edit Petition Information**

Navigate through the petition and revise the content of the petition 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**

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



#### VII. RESUBMITTING AN ACCEPTED PETITION

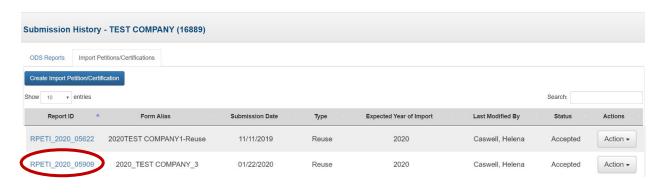
Accepted petitions can only be revised to reflect a change in the expected year of import. If other modifications are required, you will need to submit a new petition for review by EPA.

# 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 certification in CDX for review by EPA.

## **Step 1: Locate the Original Submission**

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



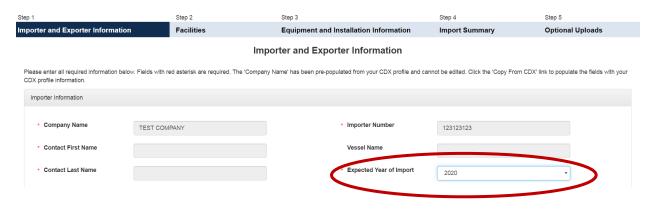
# Step 2: Enter the Submission's Passphrase

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



# **Step 3: Edit Expected Year of Import**

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



# **Step 4: Submit your Revised Petition**

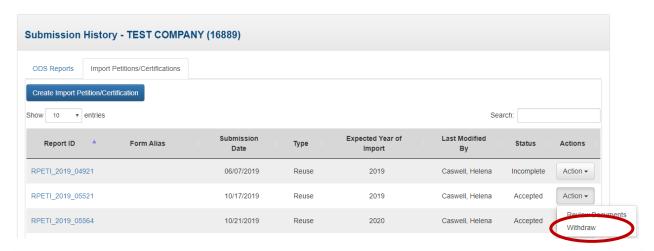
Once the 'Expected Year of Import' has been revised, click "Submit" at the bottom of the page. Review your submission's information and "Sign, Encrypt, and Submit" the petition. Refer to Section IV, Steps 4-8 for detailed instructions on completing your resubmission.



#### VIII. WITHDRAWING A PETITION

## Step 1: Locate the Petition to Withdraw

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

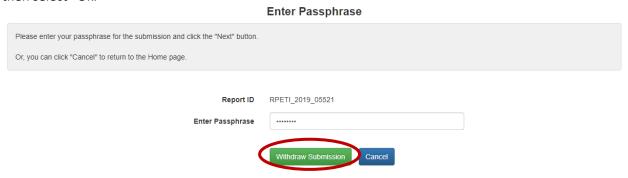


## When should I Withdraw a Report?

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



### Withdrawing a Petition



# Step 3: Certify the Submission and complete the eSignature

Complete the withdrawal of your petition 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 status will appear as 'Submitted' in the Submission History table until EPA reviews and accepts the withdrawal.