

# Reporting for Sulfur Hexafluoride Distributors

December 1, 2010

Presentation and Spreadsheet available at:  
[www.arb.ca.gov/cc/sf6nonelec/sf6nonelec.htm](http://www.arb.ca.gov/cc/sf6nonelec/sf6nonelec.htm)

Gotomeeting:  
[www1.gotomeeting.com/register/223186360](http://www1.gotomeeting.com/register/223186360)

# Presentation Overview

- Background
- Regulation Overview
- Distributor Specific Information
  - Who registers and reports?
  - Essential reported data
- Walk-through of Proposed Reporting Format
- Comments/Questions/Suggestions
- Next Steps and Reporting Deadlines

# Importance of Regulating SF<sub>6</sub>

- SF<sub>6</sub> is the most potent greenhouse gas the IPCC has identified
- Increasing at 5% per year
- Many uses are emissive (capture and recycling not feasible)
- Lifetime of over 3,200 years

**1 lb of SF<sub>6</sub> is equivalent to:**  
10 metric tons of CO<sub>2</sub>  
Driving around the world once

**1 oz of SF<sub>6</sub> is equivalent to:**  
1.5 barrels of oil

# Regulation

## **Reduce emissions of SF<sub>6</sub> from non-semiconductor and non-electricity applications**

- Reduction of 0.1 MMTCO<sub>2</sub>E annually
- Low Cost
- Blocks new uses
- Could serve as model for other states

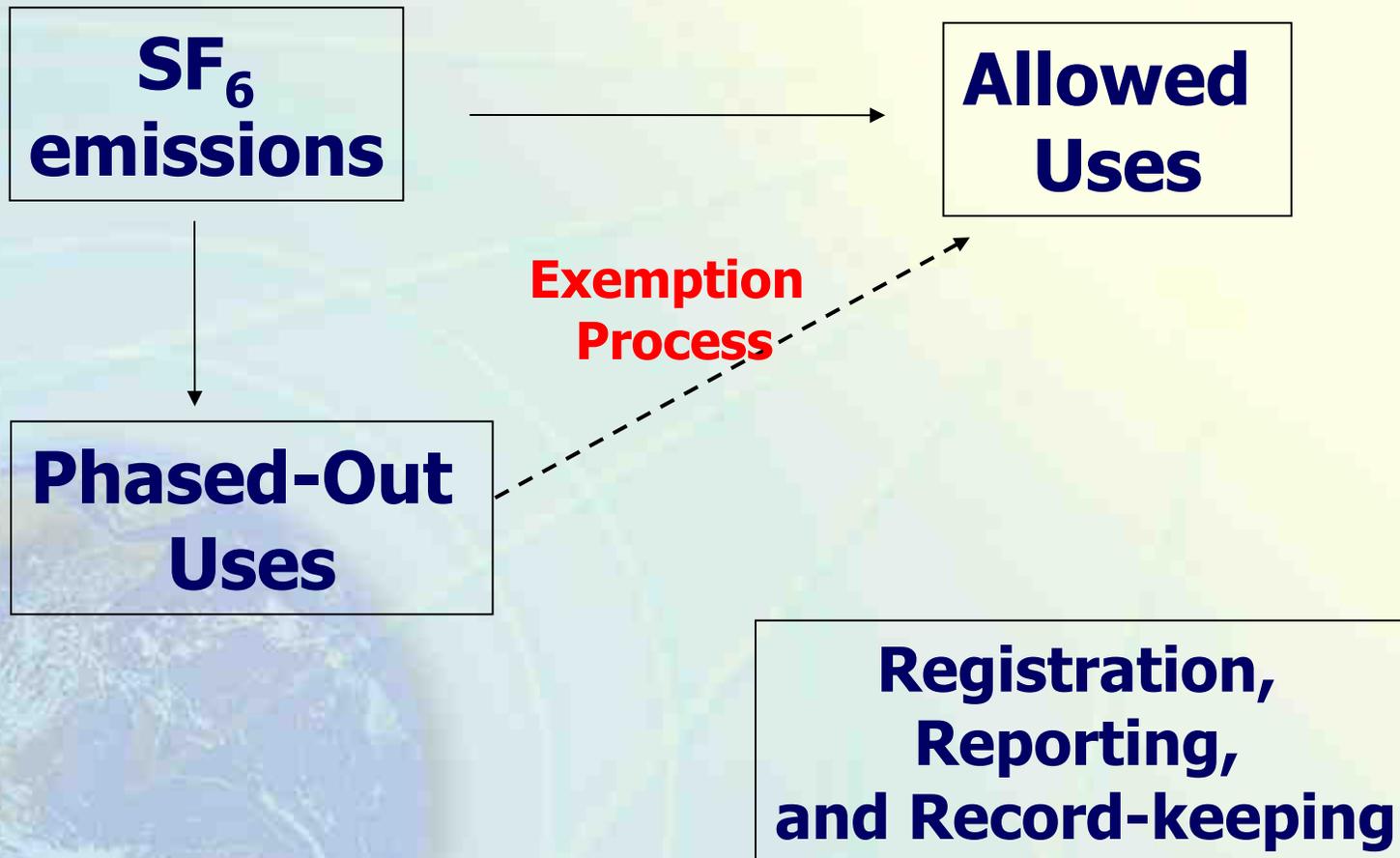
# Regulatory Development Process

- 3 public workshops
- 2 workgroup meetings and 2 sub-workgroup meetings
- Outreach
  - Government agencies
  - Industry
  - Academia
- ISOR posted on 1/8/2009
- Regulation approved by ARB 2/2009 and became effective 1/2010

# Regulation Coverage

- Electric Utilities and Semiconductor Manufacturing :
  - **Uses not covered by this regulation but distributors still report sales**
- Tracer Gas Uses:
  - Atmospheric transport
  - Fume Hood Testing
  - Characterization of ventilation systems
  - Air infiltration studies
  - Leak testing
  - Characterizing flow patterns
  - Other uses including for military purposes
- Magnesium Casting: to prevent oxidation
- Other non-electricity, non-semiconductor uses

# Components of Regulation



# Phase-Out Dates

<b>Applications</b>	<b>Effective Dates</b>
All applications except those listed below	January 1, 2011
Tracer Gas Testing	January 1, 2013
Magnesium Sand Casting	January 1, 2013
Magnesium Investment Casting	January 1, 2013
Military Applications	January 1, 2013
Military Tracer Gas Array	January 1, 2020

# Exemption Process

- One of two criteria for an exemption:
  - Uses that result in reduced GHG emissions
  - Uses with no alternatives
- Flexible enough to allow variety of applications
- Applications must include mitigation plan

# Registration, Record keeping and Reporting

- Purchasers
  - Keep records of annual quantity of SF<sub>6</sub> purchased and used
- Distributor:
  - means any person who sells or supplies sulfur hexafluoride in California, except that “distributor” does not include users who sell to a recycler or persons who return products to the seller.
- Sections 95345(a)(b) and (e)
  - Register
  - Keep records of sales for 3 years
  - Provide an annual report of each sale (quantity and date)

# Details of Distributor Requirements: Sections 95345(a)

## 95345 (a) Registration for Distributors of Sulfur Hexafluoride.

Distributors of sulfur hexafluoride must register with ARB on or before March 30, 2010. Distributors who begin conducting business in California after March 30, 2010, must register with ARB no later than 30 days after the start of their business operations. **Registration shall be in the form of a letter to the Executive Officer and must include the business names, physical address, contact name, telephone number, fax number, e-mail address, and web site address of the distributor, as applicable.**

Distributors will receive a copy of the regulation within 60 days of registering with the Executive Officer.

### Summary:

- Registration extended to June 30, 2010 or within 30 days of start of business operations in California (selling SF6 within the state)
- Registration is via letter to EO with contact and location information as stated above.

# Section 95345(b)

## (b) Recordkeeping for Distributors of Sulfur Hexafluoride.

**For each sale or supply of sulfur hexafluoride**, distributors of sulfur hexafluoride must **retain invoice showing the purchaser's name, business name, intended use, physical address, contact name, telephone number, fax number, e-mail address, web site address, as applicable, sale date, and quantity of sulfur hexafluoride purchased**. These invoices must be retained by the distributor for **at least three years**. On or before March 30, 2010 distributors must also provide all of their known purchasers of sulfur hexafluoride within the last five years, except for those purchasers exempted under section 95341(a)(1-4), a copy of this regulation (*title 17, California Code of Regulations, sections 95340 – 95346*), as approved by ARB and the California Office of Administrative Law. Distributors must also **retain documentation showing that they have met this requirement for a period of three years**. This documentation requirement will be satisfied if the distributor retains a copy of the materials mailed or emailed and the contact information for where the materials were sent. Contact information includes the retailer name, business name, physical address, contact name, telephone number, fax number, e-mail address, and web site address, as applicable.

**Distributors of sulfur hexafluoride must also provide records and other sources to ARB upon request** by the Executive Officer or his or her designee. Records include copies of all invoices, books, correspondence, electronic data, or other pertinent documents in its possession or under its control that the manufacturer, distributor or retailer retains that are necessary to prove compliance with the requirements of this sub article.

# Summary of 95345 (b)

## **Summary: Distributors must:**

- Retain invoices for 3 years. Invoices must contain data listed in the regulation:
  - **purchaser's name, business name, intended use, physical address, contact name, telephone number, fax number, e-mail address, web site address, as applicable, sale date, and quantity of sulfur hexafluoride purchased**
- Provide known purchasers (within past 5 years) with copy of regulation. Retain documentation for 3 years.
- Records available to ARB, including all information listed above.

# Section 95345(e)

## (e) Annual Reporting for Distributors of Sulfur

**Hexafluoride.** Beginning in calendar year 2011, each distributor of sulfur hexafluoride must submit an annual report to the Executive Officer by March 30th for the previous calendar year. The report must include:

- (1) Total quantity in mass of sulfur hexafluoride sold; and
- (2) A record of transactions of sales to each purchaser of sulfur hexafluoride, including the complete contact information listed in section 95345(b). Records must include the date and quantity of each sale.

### Summary:

- First distributor reporting for CY 2010 by March 30, 2011
- Must include total SF6 sales and sales by transaction including date, quantity, and purchaser information as well as intended use (as required in section 95345(b)).

# Walk-Through Proposed Reporting Format

Excel format– Can be downloaded at:

<http://www.arb.ca.gov/cc/hgwpss/meetings/meetings.htm>

# Our Questions

- Is this format viable for reporting?
- How many transactions can we expect?
- Are the fields understandable?
- Is our drop-down menu of uses inclusive?

# Next Steps

- Finalize Reporting Format – early to mid January
  - Later if substantial comments
- Reporting Deadline:
  - Distributor Reporting by March 30<sup>th</sup> every year

# Any Other Comments/Questions?

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