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Comments Received :

Dear OIRA staff,

Please see the attached document for comments from the Natural Resources Defense Council (NRDC) on EPA's proposed rule on HFC allowance allocations for 2024 and later years.

NRDC's comments cover a number of provisions, including support for EPA's proposal to require annual reporting of emissions of hazardous air pollutants (HAP), ozone depleting substances (ODS), and HFCs from each facility's HFC production line emissions units. NRDC also supports extending the same requirement to emissions of each criteria air pollutant and its precursors, and requests that EPA extend these unit-specific emissions reporting requirements to facilities that produce HFOs and other HFC alternatives.

Sincerely,
Christina Theodoridi