

CAMD’s Allowance Data Guide

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Acronyms:

ARP – Acid Rain Program

CAA – Clean Air Act

CAIR – Clean Air Interstate Rule

CAMD – Clean Air Markets Division

CBS – CAMD Business System

CFR – Code of Federal Regulations

CSAPR – Cross-State Air Pollution Rule

DR – Designated Representative

EPA – Environmental Protection Agency

FIP – Federal Implementation Plan

NBP – NO_x Budget Trading Program

NO_x – Nitrogen Oxides

NUSA – New Unit Set-Aside

OTC – Ozone Transport Commission

SIP – State Implementation Plan

SO₂ – Sulfur Dioxide

Purpose

EPA's [Clean Air Markets Division \(CAMD\)](#) implements [allowance trading programs](#) under the Clean Air Act that set an environmental goal or limit on amount of pollution and then allow participants to independently determine their best compliance strategy to reduce emissions. Some of these programs have been federally adopted (e.g., Acid Rain Program, Texas SO₂ Program), some have been adopted by states (e.g., Ozone Transport Commission NO_x Budget Program, NO_x Budget Trading Program), and some have been a combination (e.g., Clean Air Interstate Rule, Cross State Air Pollution Rule).¹ This document serves primarily as a companion to users exploring EPA's allowance trading program data, all of which are publicly available in [CAMD's data publication tool](#). It also provides basic information on EPA's active and retired allowance trading programs to offer context when analyzing data.^{2,3}

Allowance & Allowance Trading

Allowance trading is a component of a [market-based cap-and-trade program](#), which reduces emissions by setting caps (or budgets in certain programs) on total emissions and issuing allowances equal to those caps through allocation processes or auctions.

- Participants must hold allowances equal to their compliance obligations for a given period
 - Each participant's minimum compliance obligation for a control period is the amount of the participant's reported emissions for the control period.
 - Full details on monitoring and reporting requirements for emissions as regulated by 40 CFR part 75 can be found on CAMD's [emissions monitoring and reporting pages](#).
- All data under EPA's allowance trading programs are publicly available in the [CAMD's data publication tool](#).

The following table lists the allowance trading programs currently or formerly administered by CAMD. Other programs for which CAMD administers emissions data reporting functions only are *not* included. A timeline of programs is found in the Power Sector Program [Progress Reports](#).

Table 1: Allowance Trading Programs

Program	Program Code	Control Period
ARP SO ₂	ARP	Annual
CSAPR NO _x Annual	CSNOX	Annual
CSAPR SO ₂ (Group 1/2)	CSSO2G1/CSSO2G2	Annual
CSAPR NO _x Ozone Season (Group 1/2/3) ⁴	CSOSG1/CSOSG2/ CSOSG3	Ozone Season†

¹ To learn more about EPA's existing and retired allowance trading programs, visit <https://www.epa.gov/airmarkets/clean-air-markets-programs>

² Complete regulations for EPA's allowance trading programs can be found in 40 CFR parts 72-78 (ARP), 96 (NBP and CAIR state model rules) and 97 (CAIR federal rules, CSAPR, and Texas SO₂).

³ The information here represents only existing programs and does not convey information on program features in proposed rulemaking. This document will be updated as appropriate.

⁴ The CSAPR Update created the CSOSG1/CSOSG2 programs from the CSNOXOS program. The Revised CSAPR Update modified the existing CSOSG2 program and added the CSOSG3 program.

Texas SO₂	TXSO2	Annual
Ozone Transport Commission NO_x Budget Program*	OTC	Ozone Season†
NO_x Budget Trading Program*	NBP	Ozone Season†
CAIR NO_x Annual*	CAIRNOX	Annual
CAIR SO₂*	CAIRSO2	Annual
CAIR NO_x Ozone Season*	CAIROS	Ozone Season†
CSAPR NO_x Ozone Season*	CSNOXOS	Ozone Season†

† Ozone season under the programs is May 1 through September 30

* Retired program

What is an Allowance?

An allowance is a limited authorization to emit up to a specified amount of a pollutant during a specified control (or compliance) period or potentially a later control period.

- Once issued, an allowance may be bought, sold, used for compliance, or banked (held in an account for future use, to the extent allowed under the respective program).
- Eligible purchasers and sellers include not only the affected sources participating in a particular program, but also other entities or individuals.
- Allowances are program and pollutant specific, meaning that an allowance for one program may not be used for compliance in any other program (i.e., allowances for the CSAPR NO_x annual program cannot be used for the CSAPR NO_x ozone season program; or CSAPR SO₂ Group 1 & Group 2 allowances are not interchangeable).⁵
- Allowances may permit the holder to emit up to one ton of emissions depending on the circumstances and program.⁶

How are Allowances Identified?

- Each allowance is identified by a program code (Table 1), vintage year, and serial number.
 - Program code: identifies the relevant program for that allowance
 - Vintage year: The earliest year an allowance is available for use in compliance
 - i.e., An allowance allocated for 2020 can be used for compliance in 2020 or any subsequent year to the extent allowed under the respective program
 - Serial number: *program-specific* unique identifying number for each allowance

How are Allowances Tracked?

To keep a transparent official record of allowance holdings and transactions, EPA maintains an allowance management system, which is part of the broader CAMD Business System (CBS). An account in CBS is a prerequisite to holding and transferring allowances, as well as performing annual compliance tasks.

⁵The use of ARP SO₂ allowances for compliance under the CAIR SO₂ program was successfully challenged in court and was therefore discontinued when the CAIR SO₂ program was replaced by the CSAPR SO₂ programs.

⁶ Refer to the compliance sections of the [historical progress reports](#) for details on instances where particular programs have required more than one allowance to be surrendered for each ton of emissions for compliance in certain circumstances (e.g., CAIRSO2 & NBP programs)

- Each regulated facility must identify a Designated Representative (DR), who is authorized by the facility owners/operators to legally represent their compliance account.
- A DR can represent more than one source.

Allowance Account Types

Table 2: Summary of Allowance Account Types

Account Type	Definition	Example
Facility (Compliance)	<ul style="list-style-type: none"> • Established <i>only</i> by EPA to hold a participating facility's allowances • Receives initial allocated allowances each control period • Used in compliance • Prior to 2009, compliance accounts for some programs were established at the unit level instead of at the facility level 	000000FACLT
General	<ul style="list-style-type: none"> • Account opened by any entity for holding and transferring allowances 	999900000000
Reserve	<ul style="list-style-type: none"> • Special account established by EPA for certain EPA functions such as the allowance allocation, auction or new unit set-asides • Multiple subtypes of this account exist 	Varies with program
Surrender	<ul style="list-style-type: none"> • Special account established by EPA for EPA to retire allowances • Multiple subtypes of this account exist 	Varies with program

For a complete listing of account types see Appendix I.

Types of Allowance Transactions

Allowances can be acquired in multiple ways including initial allocations, new unit set-aside (NUSA) allocations, auctions, direct purchase from an allowance holder, or other less common transactions, each of which is identified with a transaction type.

Initial Allocations

- Initial allocations are allowances allocated by EPA or a state to participating sources for a given control period as specified in rulemaking at the federal or state level.
 - ARP initial allocations are the same for every control period after 2009 under the ARP regulations, and the majority of the allocations are recorded in sources' facility accounts 30 years in advance.
 - CSAPR initial allocations (and allocations under the TX SO₂ program) may change over time as provided in the respective programs' regulations and are recorded in sources' compliance accounts no more than four years in advance, depending on the control period. A state may replace EPA's default allocations with state-determined allocations (or an auction mechanism) under an approved state implementation plan (SIP).
 - Allowances with future vintage years are available in accounts and may be traded but may not be used for compliance until that particular vintage year.

New Unit Set-Aside (NUSA) Allocations

- Under CSAPR programs only, new unit set-aside allowances are made available to newly affected sources, including those located in Indian country, as well as other units not receiving initial allocations. A pool of allowances is created in each state that is at least two percent of the state's total budget for a specific program. Eligible units can receive allocations from this pool based on their recent emissions.

ARP Auction

- Under the ARP, 250,000 allowances are auctioned off to the highest bidders each year. 125,000 are available for use in the year purchased and the other 125,000 have a vintage year seven years in the future.

Private Transfer

- Allowances can be directly acquired from any entity that holds them (such as a broker). These transactions are classified as Private Transfers or Private Trades.
- EPA publishes data on the number of transactions and allowances traded in each trading program in the annual power sector program [progress reports](#).
- Data are also available from analytics firms to track allowance market prices; however, EPA does not supply or collect allowance price data or price information on individual trades in the market.

Other Transactions

- [CAMD's data publication tool](#) displays additional transaction types for all current and retired programs (see full list in Appendix II).

How is an Allowance Transaction Recorded?

- CBS is the electronic system for processing transactions where EPA receives details of the proposed transfer and an authorized transferor representative's (e.g., designated representative) approval.
- Transaction data are stored in the CAMD database and are accessible through [CAMD's data publication tool](#). The data recorded for each transaction include the total number of allowances transferred (transaction total), information about those allowances (i.e., vintage, block grouping), and accounts involved (Figure 2), as well as a unique transaction ID.
 - Block total: the difference between the start and end allowance serial numbers in a block (or group) of allowances

How are Allowances Relevant in Compliance?

- All allowance transfers must be submitted for recordation by midnight of the control period's Allowance Transfer Deadline (or the following business day if not a business day) if they are to be used for compliance in that control period.

- Under the Acid Rain Program, the allowance transfer deadline is 60 days after the end of the year of a given control period (i.e., March 1 most years and February 29 in leap years)⁷.
 - Under the CSAPR and TX SO₂ trading programs, the allowance transfer deadline is June 1 after the end of the year of a given control period⁸.
 - The transfer deadline for CAIR programs varied by pollutant: Annual NO_x and SO₂ was March 1st after the end of the year of a given control period while ozone season NO_x was November 30th after the end of the control period.
 - NBP's transfer deadline was two months, November 30th, after the end of the control period.
- CAMD conducts annual allowance reconciliation to ensure compliance.
 - Compliance is performed at the facility level.⁹ For each facility, CAMD will deduct allowances from the respective compliance account reconciling the facility's compliance obligation for the control period.
 - Allowances deducted for compliance purposes are removed from circulation and maintained indefinitely in various types of surrender accounts.
 - A facility must hold allowances in its compliance account as of the Allowance Transfer Deadline sufficient to meet that facility's compliance obligation¹⁰.
 - Allowances are generally deducted on a "first-in, first-out" basis where allowances are first deducted by their earliest vintage year, unless a facility submits a request for a different order before the control period's Allowance Transfer Deadline.
 - To the extent allowed under a particular trading program, a facility may bank unused allowances for future control periods.

What are the Penalties Associated with Excess Emissions?

If a given facility fails to hold sufficient allowances to cover emissions, there may be automatic allowance surrender and/or financial penalties.¹¹

ARP Penalty

- Under ARP, a source whose emissions exceed the allowances held in its compliance account as of the allowance transfer deadline will be required to later surrender the required quantity of allowances that was not held as of the allowance transfer deadline, and in addition will be subject to automatic financial penalties.

⁷ For control periods through 1997, the allowance transfer deadline under ARP was 30 days after the end of the year of the control period (i.e., January 30th).

⁸ For control periods through 2020, the allowance transfer deadline under the CSAPR and Texas SO₂ trading programs was generally March 1 after the end of the year of the control period, except that for the 2015 and 2016 control periods under the CSAPR NO_x ozone season program, the allowance transfer deadline was December 1 in the year of the control period.

⁹ Before the 2006 control period, compliance under the ARP was performed at the unit level.

¹⁰ A facility's compliance obligation is at least equal to the facility's reported emissions for the control period, and may be more, depending on the facility's circumstances and the regulations for the respective trading program.

¹¹ Failures to comply with the allowance holding requirements may also be subject to other penalties under the Clean Air Act (CAA) besides the automatic allowance surrender and/or financial penalties.

CSAPR Penalties

- Under CSAPR, a source whose emissions exceed the allowances held in its compliance account as of the allowance transfer deadline will be required to later surrender two times the required quantity of allowances that was not held as of the allowance transfer deadline.
 - I.e., if a source's excess emissions are 10 tons of NO_x, the source would need to surrender a total of 20 NO_x allowances to meet the 10-ton tardy compliance obligation and the 10-ton penalty for excess emissions.
- If a state's emissions exceed its assurance level, for every ton of the exceedance, the sources found responsible must surrender two extra allowances in addition to the otherwise required amounts of allowance surrenders.
 - A state's assurance level is the sum of the state's trading budget plus a defined "variability limit"¹².
- Allowances eligible for use in meeting obligations under the CSAPR excess emissions and assurance provisions include not only allowances issued for the given control period and earlier control periods, but also the immediately following control period.

What Happens to Allowances that Would Have Been Allocated to Retired Units?

- Once a unit is permanently retired, it will no longer be subject to most requirements of the trading programs. However, it may still participate in allowance trading and may continue to receive allowances for some period of time, depending on the program. Under ARP, allowance allocations continue indefinitely.
- Depending on the program and circumstances, the allowances that would otherwise have been allocated to a retired unit may be removed from the program or may be reallocated to other units in the program.

How can I Access Allowance Data?

- Allowance data, including details on allowance accounts, holdings, and transactions, are available through [CAMD's data publication tool](#) on the [CAMD webpage](#).
- Current and historical data on reported emissions, compliance and facility attributes are also available. The data:
 - May be aggregated at various levels (i.e., facility or state);
 - Are available through user-created queries, bulk data file downloads, and application programming interfaces (APIs).
- Data are provided in both .csv and .json file formats. Example data outputs are shown in the spreadsheet figures below.
- Documentation to access data through APIs can be found at the [Clean Air Markets \(CAM\) API portal](#).

¹² For more information, see the [CSAPR Assurance Provision webpage](#)

Allowance Holdings

- Figure 1 displays pertinent data from an “Allowance Holdings” query.

	A	B	C	D	E	F	G	H	I	J
	Program	Account Number	Account Name	Owner	Representative (Primary)	Account Type	Allowance Vintage Year	Serial Number Start	Serial Number End	Block Totals
1	CSOSG1	000703FACFLT	Bowen	Georgia Power Company (Operator)- Georgia Power Company (Owner)	Jason K Reynolds (608760)	Facility Account	2015	12861	13156	296
3	CSOSG1	000703FACFLT	Bowen	Georgia Power Company (Operator)- Georgia Power Company (Owner)	Jason K Reynolds (608760)	Facility Account	2015	13157	14580	1424
4	CSOSG1	000703FACFLT	Bowen	Georgia Power Company (Operator)- Georgia Power Company (Owner)	Jason K Reynolds (608760)	Facility Account	2016	16341	16450	110
5	CSOSG1	000703FACFLT	Bowen	Georgia Power Company (Operator)- Georgia Power Company (Owner)	Jason K Reynolds (608760)	Facility Account	2016	16451	17253	803
6	CSOSG1	000708FACFLT	Hammond	Georgia Power Company (Operator)- Georgia Power Company (Owner)	Jason K Reynolds (608760)	Facility Account	2015	74658	75530	873

Figure 1: Allowance blocks are tracked by the account they belong to and may be owned by more than one entity.

Allowance Transactions

- A single transaction may have multiple lines in a report due to the grouping of allowances into blocks.
- E.g., in Figure 2, transaction 258 is shown on two lines where a total of 21 allowances (column c) were transferred. The first line indicates a sequential block of 11 allowances (column k), while the second line represents a second block of the remaining 10 allowances.

	A	B	C	D	E	F	G	H	I	J	K
	Program	Transaction ID	Transaction Total	Transaction Type	Account Name (Transferor)	Account Name (Transferee)	Transaction Date	Allowanc	Serial Number Start	Serial Number End	Block Totals
1	CSOSG1	258	21	Private Transfer	Wansley (6052)	Dalton Utilities	6/15/2017	2017	12171	12181	11
3	CSOSG1	258	21	Private Transfer	Wansley (6052)	Dalton Utilities	6/15/2017	2017	12929	12938	10
4	CSOSG1	257	58	Private Transfer	Scherer	Dalton Utilities	6/15/2017	2017	14558	14586	29
5	CSOSG1	257	58	Private Transfer	Scherer	Dalton Utilities	6/15/2017	2017	16608	16636	29
6	CSOSG1	874	21	Private Transfer	Wansley (6052)	Dalton Utilities	2/12/2019	2018	12747	12767	21

Figure 2: Allowance transaction report with select fields shown.

Bulk Data Files

- Large bulk datasets are available for download in the following groupings:
 - Allowance Transactions by program.
 - Annual Compliance data by program.
- E.g., The CSNOX transaction file includes all records of allowance transactions for the CSNOX program.
- Each of these datasets is updated annually with the previous year’s data.
- Files are accessible through [CAMD’s data publication tool](#).

For further information including annual market and compliance summaries and trends:

- https://www3.epa.gov/airmarkets/progress/reports/market_activity.html
- https://www3.epa.gov/airmarkets/progress/reports/program_compliance.html

APPENDIX I: Complete List of Allowance Account Types

Account Type	Definition	Programs
Facility Account	Account established to hold a participating facility's allowances used in compliance and to receive initial allowance allocations each control period	ARP (since 2006), CAIR, CSAPR, TXSO2
General Account¹³	Account that may be opened by any entity for holding and transferring allowances	ARP, CAIR, CSAPR, NBP, OTC, TXSO2
New Unit Set-Aside Reserve Account	Reserve account that holds allowances available for allocation to new units in CSAPR trading programs	CSAPR
Overdraft Account	A type of account established to assist with facility-level compliance in programs where compliance was determined at the unit level rather than the facility level	NBP, OTC
Reserve Account¹⁴	A type of account generally used to hold allowances available for allocation	ARP, CAIR, CSAPR, NBP, OTC, TXSO2
State Holding Account	A type of account specific to a state for holding allowances available for allocation such as (new unit) set-asides or allowances for programs being terminated (i.e. NBP)	ARP, CAIR, CSAPR, NBP, OTC
Surrender Account	Special account established by EPA for retiring allowances from compliance, penalties or a program termination	ARP, CAIR, CSAPR, NBP, OTC, TXSO2
Unit Account	Account established to hold a participating unit's allowances used in compliance and to receive initial allowance allocations each control period in programs where compliance was determined at the unit level rather than the facility level.	ARP (through 2005), NBP, OTC

¹³ General Account information for OTC cannot be queried in the database. However, there are still records of allowance transactions involving those accounts which can be queried.

¹⁴ Many variations of this account type exist, such as state-specific reserve accounts. ARP also uses this type of account for compliance emissions deductions as opposed to all other programs which use surrender accounts. ARP uses surrender accounts for enforcement and voluntary surrender actions

APPENDIX II: Complete List of Allowance Transaction Types

Transaction Type	Definition	Programs
CAIROS Transfer from NBP	Issuance of CAIROS allowances converted from NBP allowances during program transition for certain states	CAIR
CSAPR Ozone Season Emissions Adjustment Deduction	Deduction adjustment based on adjusted emissions data	CSAPR
Conservation Issuance	Allocation of allowances for energy conservation programs	ARP
Conversion of NBP allowances into CAIROS	Issuance of CAIROS allowances converted from NBP allowances during program transition	CAIR
Deduction of Loaned Allowances	Deduction for compliance of allowances transferred from another unit at the same source after the Allowance Transfer Deadline	ARP
Distribute Allowances for New Program	Allocation of revintaged CSAPR NO _x ozone season allowances to Group 1 facilities after the CSAPR Update ¹⁵	CSAPR
Distribute Revintaged Allowances	Allocation of revintaged CSAPR NO _x ozone season allowances to Group 2 facilities after the CSAPR Update or allocation of revintaged CSAPR allowances after the stay of original CSAPR was lifted ¹⁵	CSAPR
Distribute Revintaged Allowances for Revised CSAPR Update	Allocation of 2021 NO _x OS Group 3 allowances to compliance accounts of sources transitioning to the NO _x OS Group 3 program to establish initial allowance bank under the Revised CSAPR Update ¹⁵	CSAPR
Early Reduction Allocation	Allocation from the Compliance Supplement Pool for eligible units that reduced their NO _x emission rate under criteria in SIPs	NBP
Early Reduction Issuance	Allocation for voluntary early SO ₂ reductions or early NO _x reductions	ARP, CAIR
Emissions Adjustment Deduction	Deduction adjustment based on adjusted emissions data	ARP, CSAPR, CAIR
Emissions Deduction	Deduction from a source's compliance account to account for a source's control period emissions	ARP, CSAPR, CAIR, NBP
Energy Biomass Issuance	Allocation for renewable energy generation	ARP
Energy Geothermal Issuance	Allocation for renewable energy generation	ARP
Energy Solar Issuance	Allocation for renewable energy generation	ARP
Energy Wind Issuance	Allocation for renewable energy generation	ARP

¹⁵ For further information about CSAPR Ozone Season groups visit <https://www.epa.gov/csapr/revised-cross-state-air-pollution-rule-update>

Enforcement Surrender¹⁶	Surrender of allowances pursuant to enforcement actions outside the trading program	ARP, CSAPR, CAIR
Error Correction	Transfer to remedy an incorrect transfer in the allowance tracking system	ARP, CAIR, NBP
Error Reversal	Transfer to reverse a previous allowance transfer; this must occur before an error correction takes places	ARP, CSAPR, CAIR, NBP, OTC
Initial Allocation	Allocation to participating sources on an annual basis in an amount determined through EPA or state rulemaking	ARP, CSAPR, CAIR, NBP, OTC
Internal Transfer to Reduce Offset	Transfer of allowances between unit accounts at the same facility after the Allowance Transfer Deadline; this must occur before deduction of loaned allowances	ARP
July Confirmation Credit	Deduction adjustment based on a submitted confirmation report under a Phase I reduced utilization plan	ARP
July Confirmation Deduction	Deduction adjustment based on a submitted confirmation report under a Phase I reduced utilization plan	ARP
NBP Additional Emissions Deduction from CAIROS Account	Deduction from CAIROS account for NBP emissions adjustment in year prior to program transition	CAIR
NBP Penalty Deduction from CAIROS Account	Penalty deduction from CAIROS account for NBP penalty in year prior to program transition	CAIR
New Unit Set-Aside Allocation	Allocation to newly affected CSAPR sources (including those located in Indian country) that did not receive initial allocations	CSAPR
Offset/Penalty Deduction	Allowance deduction in the case of excess emissions	ARP, CSAPR, CAIR
Opt-In Allocation	Allocation to units that have opted into a trading program	ARP, NBP, OTC
Opt-in Transfer to Replacement Unit	Transfer from a retired opt-in source's account to a replacement unit's account	ARP
Other Reserve Allocation	Allocation of allowances from the Texas SO ₂ Supplemental Allowance Pool	TXSO ₂
Penalty Deduction	Deduction of allowances from a unit account as a result of excess emissions for a given control period	NBP, OTC
Phase 1 Extension Issuance	Allocation to units awarded allowances for installation of qualifying Phase I technology	ARP
Phase 1 Extension Projected Emission Deduction	Deduction adjustment to correct for differences between actual and projected emissions at units awarded allowances for installation of qualifying Phase I technology	ARP

¹⁶ This transaction type has also been used to retire allowances that were allocated to units incorrectly identified as affected units.

Phase 2 Early Reduction Payback	Surrender of later-vintage allowances in exchange for earlier-vintage allowances issued for Phase 2 early reductions	ARP
Private Trade	Private transaction between any general, facility or unit accounts not part of initial/special allocations or compliance/surrender	NBP, OTC
Private Transfer	Private transaction between any general, facility or unit accounts not part of initial/special allocations or compliance/surrender	ARP, CSAPR, CAIR
Purchase at EPA Auction	Purchase of allowances from the Acid Rain Program auction	ARP
Purchase at Private Auction	Transfer of allowances purchased at a private auction	ARP
Reallocation Surrender	Reallocation of allowances among units based on final Phase 2 allocation rule	ARP
Reallocation Transfer	Reallocation of allowances among units based on final Phase 2 allocation rule	ARP
Recall State Program Allowances	Deduction of 2021-2024 NOx OS Group 2 allowances previously allocated to sources located in states transitioning to the NOx OS Group 3 program under the Revised CSAPR Update ¹⁷	CSAPR
Reduced Utilization Issuance	Allocation of allowances to a source that has an approved phase I reduced utilization plan	ARP
Reduced Utilization Payback	Surrender of later-vintage allowances in exchange for extra earlier-vintage allowances issued under a phase I reduced utilization plan	ARP
Reduced Utilization Termination	Surrender of allowances allocated under an approved phase I reduced utilization plan upon its termination	ARP
Remove for Reissuance	Deduction of banked 2015/2016 CSAPR NOx ozone season allowances to be revintaged to 2017 under the CSAPR Update or deduction of CSAPR allowances to be revintaged after lifting of the CSAPR stay	CSAPR
Remove for Revised CSAPR Update Reissuance	Deduction of banked 2017-2020 NOx OS Group 2 allowances held in compliance accounts of sources transitioning to the NOx OS Group 3 program under the Revised CSAPR Update ¹⁷	CSAPR
Return of CAIR Allowances	Restoration of allowances previously deducted for sunsetting of CAIR after the stay of CSAPR	CAIR
Return of unused allowances from the Conservation and Renewable Energy	Return of unused allowances from a reserve to units from which allowances were initially withheld to establish the	ARP

¹⁷ For further information about CSAPR Ozone Season groups visit <https://www.epa.gov/csapr/revised-cross-state-air-pollution-rule-update>

Reserve	reserve	
Reverse Substitution Payback	Reversal of a substitution payback transaction following termination of a substitution plan	ARP
Small Diesel Issuance	Allocations of allowances to subsidize small diesel refineries participating in fuel desulfurization activities	ARP
State Cap Deduction	Surrender of allowances allocated to a unit covered by a substitution or reduced utilization plan in order to account for limits imposed by a pre-1990 Clean Air Act Amendments (CAAA) multi-unit state emissions cap	ARP
State Cap Issuance	Issuance of extra current-vintage allowances to satisfy a deduction requirement for a unit covered by a substitution or reduced utilization plan and subject to a pre-CAAA multi-unit state emissions cap	ARP
State Cap Payback	Surrender of later-vintage allowances in exchange for extra earlier-vintage allowances issued to satisfy a deduction requirement for a unit covered by a substitution or reduced utilization plan and subject to a pre-CAAA multi-unit state emissions cap	ARP
State Reallocation	Reallocation by a state to a compliance account or general account of allowances initially allocated by EPA to a state governed set-aside account	CAIR, NBP, OTC
Substitution Control by Contract Deduction	Deduction for exceedance of the allowed maximum emission rate for a unit in a substitution plan establishing common control by contract instead of by ownership	ARP
Substitution Issuance	Allocation to a unit defined as a substitution unit under an approved Phase I substitution plan	ARP
Substitution Payback	Surrender of later-vintage allowances in exchange for extra earlier-vintage allowances issued under a substitution plan	ARP
Substitution Termination	Surrender of allowances issued under a substitution plan after the termination of said plan	ARP
Takeback for Underutilization	Allocation adjustment for new units to account for differences between actual and projected utilization	NBP
Terminate NO_x Budget Programs Allowances¹⁸	Surrender of NBP allowances issued as early reduction credits that were not used for compliance in the first two program	NBP, OTC

¹⁸ This transaction type has also been used to terminate banked OTC allowances during the transition to NBP

	years	
Terminate State Program Allowances	Transfer into a temporary holding account of ARP allowances held by non-ARP sources for use in the former CAIR SO2 program	ARP, CAIR
Terminate to CAIROS	Removal of remaining NBP allowances for conversion to CAIROS allowances during program transition for certain states	NBP
Termination of NBP allowances into CAIROS	Removal of remaining NBP allowances for conversion to CAIROS allowances during program transition	NBP
Transfer from Legacy System	Transfer from a legacy unit account to a facility account	ARP
Underutilization Deduction	Deduction for underutilization of a Phase I unit to account for generation and emissions shifted to Phase II units	ARP
Voluntary Surrender	Surrender of allowances by a source or other allowance holder for reasons other than program compliance or enforcement	ARP, CSAPR, CAIR