



Agenda for Ozone Depleting Substances (ODS) Technical Working Group Meeting 5

June 25th | 8:00 am – 10:00 a.m.

Topic 1: Point of Origin Requirements (refrigerants)

Ecology will present a considered revision to **refrigerant point of origin requirements** based on ACR's ODS 2.0 Protocol

Discussion Questions:

- What additional context or considerations related to this topic should Ecology be aware of?
- Are there supplies of ODS that would become more or less viable following adoption of this change? (For example: quantities >500 lbs where the equipment information is unavailable or small quantities that would now require additional documentation)
- How would this change impact project registration/verification activities?
- Does this change impact registry or verifier ability to review regulatory compliance in the chain of custody?
- Should Ecology adopt ACR ODS 2.0 Point of Origin approach for refrigerants?

Topic 2: Foam Analysis procedure

Ecology will present a considered protocol revision to **foam analysis procedure** based on ACR's ODS 2.0 Protocol

Discussion Questions:

- What additional context or considerations related to this topic should Ecology be aware of?
- How would this change impact foam destruction activities?
 - Does this meaningfully reduce developer costs?
 - Does this meaningfully reduce quantification rigor?
- Taken together with other foam revisions discussed (revised leak rates, additional eligible substances) do these revisions change the financial viability of foam destruction?
- Should Ecology adopt ACR's foam sampling approach?

Topic 3: Allow ODS destruction outside of the US

Ecology will present a considered protocol revision to allow **destruction of ODS** outside of the United States

Discussion Questions:

- What additional context or considerations related to this topic should Ecology be aware of?
- Is the flexibility to destroy ODS outside of the US - given that ODS must be sourced from the US and there are no destruction facilities in Canada - useful for developers?
- Are the Montreal Protocol's TEAP standards for destruction facilities functionally equivalent with US CAA and NESHAP standards for destruction facilities?

- Should emissions from ODS transport, currently typically estimated using a default factor multiplied by weight be adjusted for international transport?
- Should Ecology allow ODS destruction outside of the US?

Topic 4: ODS sourcing from Canada

Ecology will present a considered protocol revision to crediting for **ODS sourced from Canada**, irrespective of the requirement that ODS project include material sourced from Washington state in order to demonstrate Direct Environmental Benefits to the state of Washington

Discussion Questions:

- What additional context or considerations related to this topic should Ecology be aware of?
- Canada's Refrigerant Management Program (RMC) collects a levy on refrigerant import and distribution which then funds the lifecycle management of CFC's and HCFC's – including funding the destruction of CFC's
 - Can WA state credit issuance for destruction of refrigerants eligible for Canada's RMC program be considered additional?
- Not all ODS in Canada is eligible for the RMC program. The program applies to companies that annually import more than 100 kg of halocarbons for use as a refrigerant in non-domestic refrigeration or stationary AC systems or that manufacture or reclaim halocarbon for use as a refrigerant in non-domestic refrigeration or stationary AC systems
 - Are RMC ineligible ODS potentially a significant source of material for destruction?
- Are there other federal or provincial programs in Canada that impact ODS lifecycle management?
- Should Ecology allow ODS destruction from any ODS sourced from Canada?
- Should Ecology allow ODS destruction from RMC ineligible ODS sourced from Canada?

Topic 5: Ecology's next steps and timelines

Public comment opportunity

- There will be a 15-minute public comment period. Public members are welcome to speak for up to two minutes. The comments should be focused on the content of the Ozone Depleting Substances Technical Working Group topics. Ecology will not respond to comments made by the public. Members of the public may provide written comments on the rulemaking process through the [digital comment platform](#).

Next Steps, action items, and resources

- Contact Jordan Wildish at CCAOoffsets@ecy.wa.gov or 360-280-6488
- [Ozone Depleting Substances Technical Working Group webpage](#)
- [Cap-and-Invest Offsets webpage](#)
- [ACR ODS 2.0 Eligible Destruction Facilities \(Section 2.1, p.9 \)](#)
- [ACR ODS 2.0 Foam sampling procedure \(Section 6.1.IX.C and D, p.36\).](#)
- [ACR ODS 2.0 Point of Origin Determination \(Section 6.2, p.37\)](#)
- [Refrigerant Management Canada program report](#)