

Ozone Depleting Substances Technical Working Group

Meeting #1: April 2nd, 2024



Agenda – Meeting #1

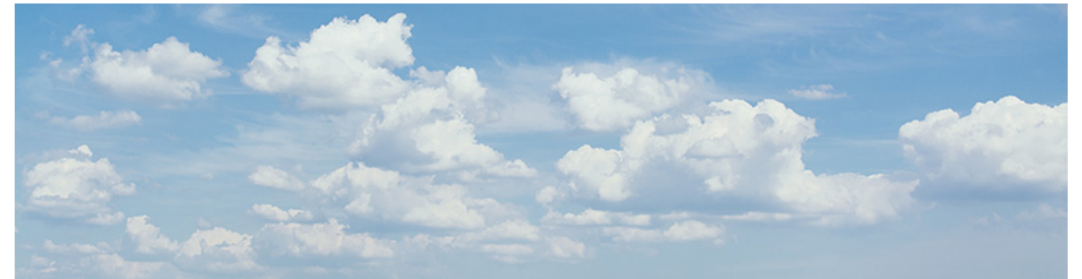
- Meeting overview
- Group introductions
- Introduce group charter, purpose, and expectations
- Discussion
- Overview of planned working group topics
- Discussion
- Wrap up and next steps
 - Next meeting: April 23rd, 8:00 am PT
- Public comment opportunity



Welcome!

- Meeting is a part of the [446 Offset Rulemaking process](#)
- **Meetings will be recorded**
- Meetings are open to the public
- Technical Working Group members will appear as “Panelists” in the Zoom meeting
- Members of the public will appear as “Attendees”
- Attendees may unmute and provide comment in the public comment portion of the meeting
- Summary notes will be published on EZView

Offset - Ozone Depleting Substances Technical Working Group



Working group description and purpose

The Ozone Depleting Substance Offset Protocol Technical Working Group will be comprised of individuals with expertise in the development, registration, verification, or analysis of compliance or voluntary ozone depleting substances projects. As part of the [WAC 173-446 Offsets Rulemaking](#), Ecology is considering revisions and additions to offset protocols adopted in WAC 173-446. The purpose of this working group is to help inform Ecology's decisions related to revisions to the adopted California's Air Resources Board (CARB) Compliance Offset Protocol – Ozone Depleting Substances– November 14, 2014. The working group will provide input on a series of potential revisions under consideration sourced from CARB [2021 Offset Taskforce Report](#), voluntary offset market protocols, and public comments received during this rulemaking.

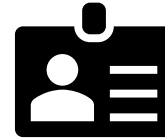
Meeting schedule

The working group is expected to begin in March and will meet every three weeks for 3-6 months. Meetings will last 2-3 hours.

Zoom tips and tricks



Panelists please keep yourself muted unless you're speaking.



Please rename yourself with your affiliation: Click on 'Participants,' hover over your name Click 'More' then 'Rename.'



Attendees use the Raise Hand feature during public comment period.



For panelists please keep your video on as bandwidth allows.

Technical Support

Please contact Piper Tulley:

- Request support via the Q&A feature
- Or contact directly
 - Piper.tulley@ecy.wa.gov
 - 564-233-1575



Panelist Introductions

- Please share:
 - Name
 - Position and affiliation
 - Experience relevant to Ozone Depleting Substances protocols or project development

Background and Purpose of Group

- The ODS Technical Working Group is composed of 8 members providing input on specific technical considerations related to Ecology's ODS offset protocol.
- Technical working group members will provide input to Ecology on specific topics related to the offset protocol
- Ecology will use input to inform its rulemaking, in tandem with public comment, Tribal consultation, and internal review.

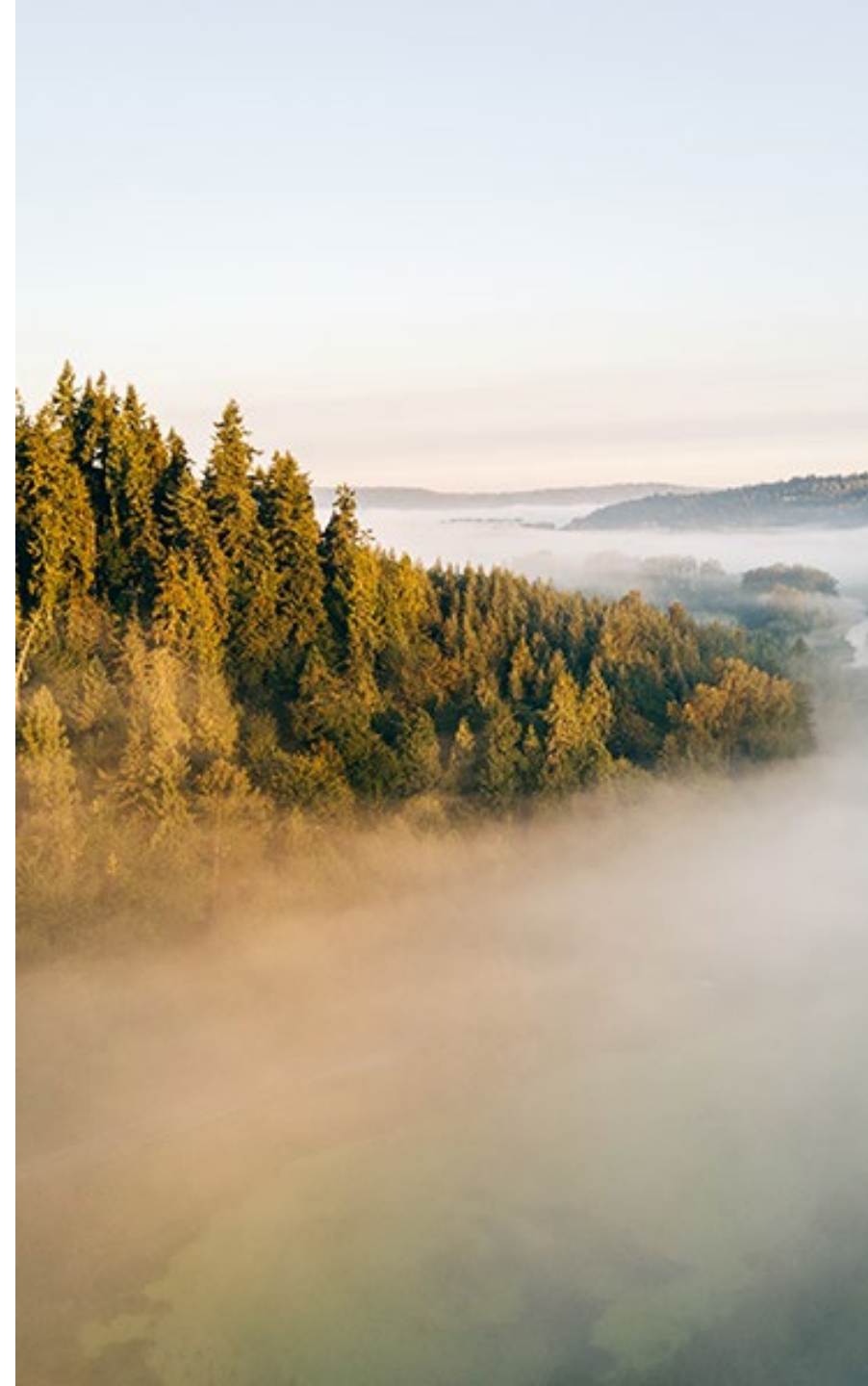


Rulemaking timeline



Programmatic Goals of ODS Protocol Updates

- Reflect advances in policy and scientific understanding
- Remove unnecessary project development barriers, inefficiencies, and exclusions
- Increase methodological rigor



Overview of Group Charter

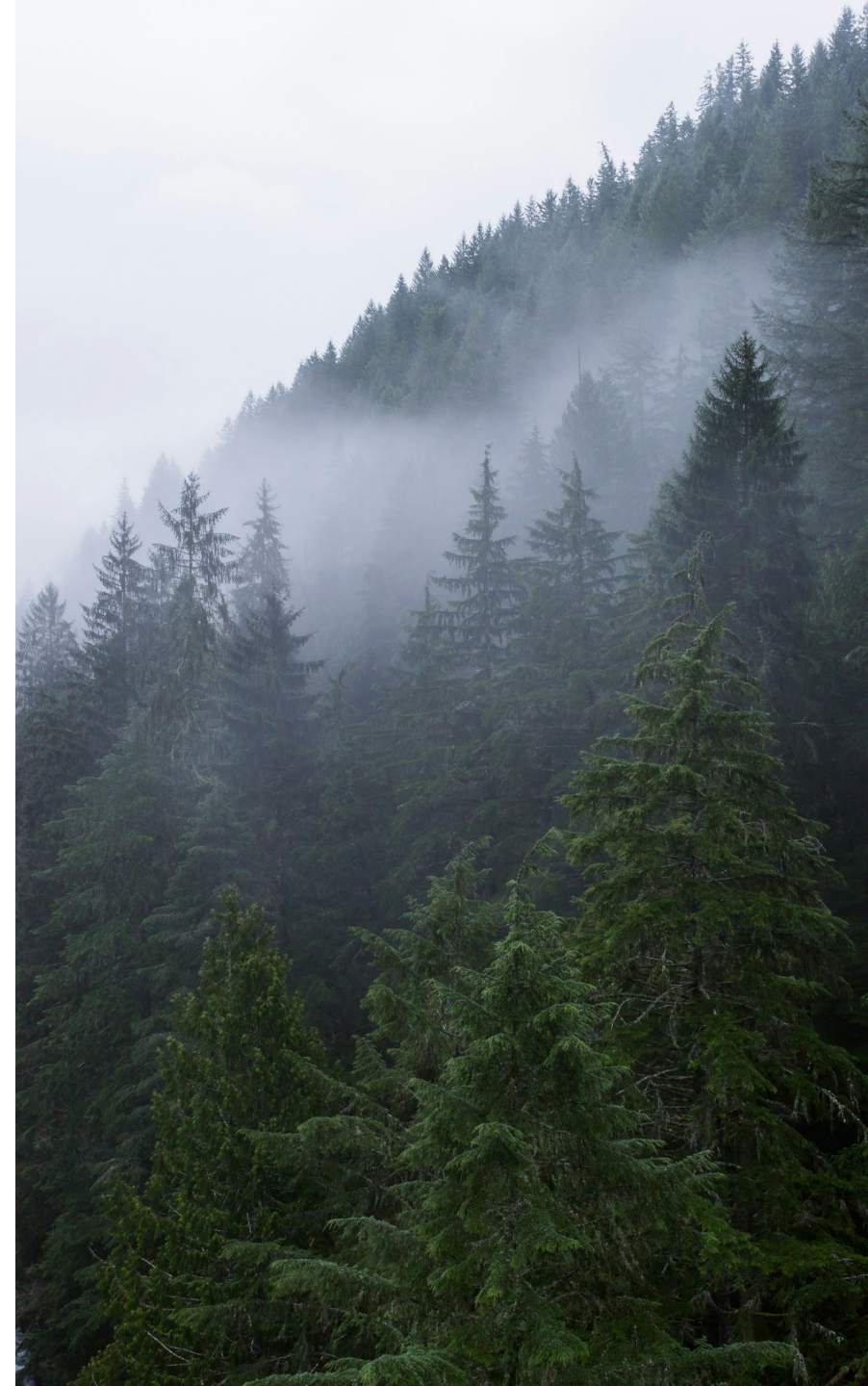
Adaptation, development, and adoption of new offset protocols must both reflect the legal requirement that compliance offset credits be:

- Real
- Permanent
- Quantifiable
- Verifiable
- Enforceable
- Additional
- Meet the needs of project developers in order to be viable in the market.



Membership

- Membership is voluntary
- Send alternatives if unable to attend
- Request members participate for the duration of the working group
 - If a member can no longer participate, Ecology may seek an alternate



Desired Outcomes

- Input from individual members on a series of potential protocol changes compiled by Ecology
 - Input will be structured around a series of questions developed by Ecology
- Consensus recommendations are not the intended outcome
- Any rule changes will be informed by working group input, public comment, tribal consultation, and internal review



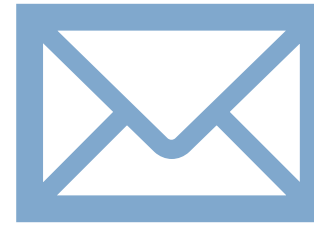
Meeting Logistics

- Meetings will be virtual
- No quorum requirement – we'll do our best to schedule a time that works for all and will seek to provide opportunities to engage on discussion topics if a meeting is missed
- Agendas will be posted at least one week in advance
- Members will be asked to review summary notes to ensure summary adequately captures discussion

Public Participation



Meetings will be public and recordings
and will be posted publicly after
meeting



All emails to and from Ecology
are part of the public record

Expectations of Working Group Members

- Attend and engage in working group meetings
- Review meeting agenda and materials prior to meetings
- Review meeting summary notes after each meeting
- Participate actively and in good faith in the working group

Work Group Discussion

Topic 1

- What recommendations do you have for Ecology on practices or approaches that have worked well (or not worked well) in similar groups?



Work Group Discussion

Topic 2

- What other questions or feedback on the working group charter or group function do you have?



Break – 10 minutes

Overview of planned topics

- List is preliminary
- Comprised of potential revisions aggregated from comparable protocols (ACR and Verra), ARB Taskforce report, public comments
- Working group members are strongly encouraged to recommend additional potential topics through the course of this working group
 - Recommendations can be made during discussion today, or at any point throughout the process

How working group members will be asked to engage with each topic

- Ecology will present a potential protocol revision, including the source of the potential revision
- Presented revisions may or may not include specific proposed protocol language
- Working group members will be asked to provide input on how these protocol revisions may or may not contribute to Ecology's programmatic goals for this rulemaking:
 - Reflect advances in policy and scientific understanding
 - Remove unnecessary project development barriers, inefficiencies, and exclusions
 - Increase methodological rigor

Meeting structure

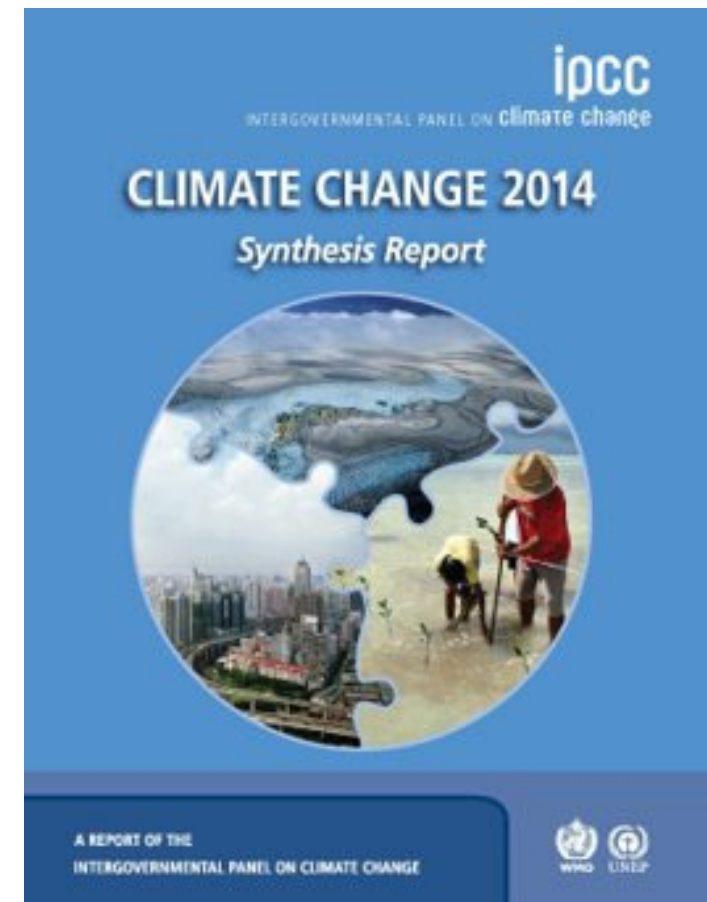
- Each meeting will cover 2-3 of the following proposed topics
- Ecology staff will present a brief overview of the topic, sources of the proposed revision, treatment in relevant voluntary protocols
- Working group members will be asked to weigh in on questions about each topic and identify any alternatives that Ecology should consider

Potential revisions to be discussed

Science and policy updates	Barriers to project development
Update Global Warming Potential values to AR5	Restrict invalidation liability to non-compliance related to ODS handling and destruction
Expand list of eligible refrigerants to include additional gases that have now been phased out of production	Allow ODS sourced from federal government
Revise 10 year cumulative emissions rates for refrigerants and/or foam	Allow destruction of ODS outside of the US
Revise substitute emissions calculations	Allow destruction of ODS sourced from Canada
	Revise Point of Origin requirements

Update Global Warming Potential values to Fifth Assessment Report

- Current: Global Warming Potential (GWP) values from foams and refrigerants have been changed from Intergovernmental Panel on Climate Change (IPCC) Fourth Assessment Report (AR4) to IPCC AR4 values
- Considered change: Use IPCC Fifth Assessment Report (AR5) used in ACR and Verra protocols
 - GWP values were largely revised slightly down for relevant gases from AR4 to AR5
- Alternatives:
 - Consider adopting a schedule for updating these values



Expand list of eligible refrigerants

Current

- Eligible refrigerants
 - CFC-11
 - CFC-12
 - CFC-13
 - CFC-113
 - CFC-114
 - CFC-115
- Eligible foams
 - CFC-11
 - CFC-12
 - HCFC-22
 - HCFC-141b

Considered change(s)

- Additional eligible refrigerants
 - HCFC-22
 - HCFC-123
- Additional eligible foams
 - HCFC-142b
 - HFC-134a
 - HFC-245fa
 - HFC-365mfc
- Medical Aerosols
- Fire Suppressants
- Solvents

Restrict invalidation of offset credits to non-compliance that directly impacts ODS handling and destruction

- Current: Invalidation regulation requires invalidation for any non-compliance event during the completion of the project
- Considered change: Restrict invalidation liability to only noncompliance events related to ODS handling and destruction

Revise or remove 10-year cumulative emissions rates for refrigerants

- Current: ODS projects are credited based on the estimated 10-year emissions of the substance, absent destruction
- Considered change: revise the 10-year emissions rate table, based on updates to underlying sources and/or new sources
- Alternative:
 - Remove 10-year emissions rates

Revise or remove 10-year cumulative emissions rates for foams

- Current: ODS projects are credited based on the estimated 10 year emissions of the substance, absent destruction
- Considered change: revise the 10-year emissions rate table, based on new sources
- Alternative:
 - Remove 10 year emissions rates

Remove or revise substitute emissions for ODS offset calculation

- Current: Substitute emissions are subtracted from the amount of offsets issued, based on default values tied to each substance
- Considered change: Revise/update substitute emissions rates
- Alternative
 - Remove this component for refrigerants, reflecting baseline of disposal

Allow ODS sourced from federal government

- Current: ODS sourced from federal government installations or stockpiles is not eligible under this protocol.
- Considered Change: Allow ODS sourced from federal facilities, excluding strategic stockpiles or inventories that are otherwise required to be destroyed or converted

Allow ODS sourced Canada

- Current: All ODS must be sourced from stocks in the United States or its territories
- Considered Change: Eligible refrigerants must originate from equipment, systems, or other supplies legally sold for use in the United States or Canada.

Allow ODS destruction outside the US

- Current: destruction facility requirements:
 - RCRA permit or demonstrated compliance with TEAP standards
 - and a Title V Air Permit, CAA and NESHAP standards
- Considered change:
 - RCRA permit or TEAP compliance
 - Or CEPA compliance (for facilities in Canada)
 - or all applicable federal, state, provincial, local requirement for facilities outside the US and Canada



Revise Point of Origin Requirements

- Current: Point of origin is defined the point of aggregation to a quantity of >500 lbs or the location where the ODS was removed from service (if in a quantity >500 lbs)
- Considered change:
 - II. Point of origin is defined as follows:
 - A. For refrigerant ODS, medical aerosol ODS, solvent ODS, or fire suppressant ODS:
 - i. The point of origin for all ODS not recovered at an equipment de-manufacturing facility is the location of the ODS prior to acquisition by the project proponent.
 - ii. The point of origin for all ODS recovered at an equipment de-manufacturing facility is the equipment de-manufacturing facility.
 - iii. The point of origin for all ODS stored in a stockpile, as of the publication date of this methodology, is the location of the stockpile.

ODS Discussion

Topic 1

- What topics or alternatives are missing from this list?



A photograph of a snow-covered mountain range under a clear blue sky. The foreground shows a wide, flat expanse of snow, possibly a meadow or a ski run. In the middle ground, there are several mountain peaks covered in snow, with some evergreen trees scattered across the slopes. In the background, a prominent, rounded mountain peak is visible against the sky. The overall scene is bright and clear, suggesting a sunny day in winter.

ODS Discussion

Topic 2

- In addition to comparable protocols, Offset Taskforce report, and public comment, are there additional sources should Ecology look to for potential offset protocol refinements?



ODS Discussion

Topic 3

- What additional criteria should Ecology ask working group members to comment on through these discussions?
 - Working group members will be asked to provide input on how these protocol revisions may or may not contribute to Ecology's programmatic goals:
 - *Reflect advances in policy and scientific understanding*
 - *Remove unnecessary project development barriers, inefficiencies, and exclusions*
 - *Increase methodological rigor*

ODS Discussion

Topic 4

- What information should Ecology provide related to each topic to frame the discussion?





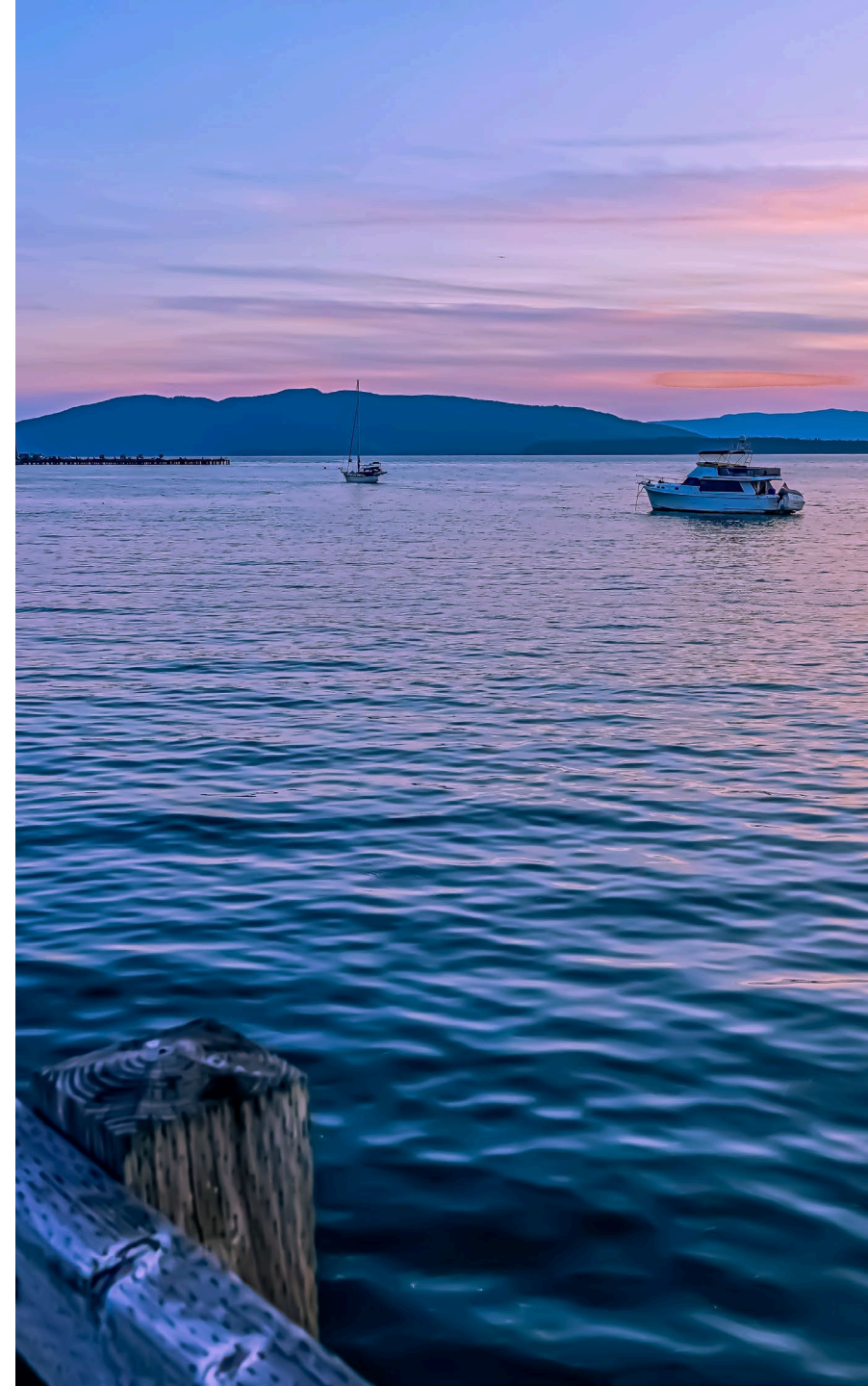
Next steps

- Meeting #2 is 4/23/2024 at 8 am (PT)
- Topics for Meeting #2
 - Update Global Warming Potential (GWP) values
 - 10 year cumulative emissions rates for refrigerants
 - 10 year cumulative emissions rates for foams

Public Comment Opportunity

Guidelines for providing public comment:

- Up to two minutes per person
- Host will unmute you and begin timer
- Please keep the comments related to offsets and ozone depleting substances
- Ecology will not respond to comments in this meeting
- To submit written comments, use our [digital comment platform](#)
- Please use “raise hand” button to indicate that you wish to provide a comment



Thank you!

Contact:

CCAOffsets@ecy.wa.gov

