



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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Summary notes ODS Technical Working Group Meeting #5

Topic 1: Point of Origin Requirements (refrigerants)

What additional context or considerations related to this topic should Ecology be aware of?

- Ecology should consider ACR 2.0 Protocol treatment of stockpiled gases as part of point of origin revision
- Existing 500 lbs threshold does not have a specific regulatory basis
- Broadening point of origin threshold would improve tracking for small quantities
- ACR's point of origin revisions corresponded with their development of an international protocols, where documentation may be more fragmented

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) Jon- we have to provide a serial # for the equipment OR a description of where the equipment was.

- ACR's adoption of a stockpile date in this protocol makes some quantities of ODS more viable for destruction
- Verifiers will use a random sampling approach rather than verifying every POI
- The amount of additional work for developers and verifiers may not be especially significant
- Stockpiled ODS may be easier to developer/verify through ACR's ODS 2.0 protocol

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?

- This change may reduce verifier ability to verify regulatory compliance by not requiring the chain of custody to track quantities over 500 lbs to be traced back to the point of extraction

Should Ecology adopt ACR ODS 2.0 Point of Origin approach for refrigerants?

- Improves opportunity for participation, but creates may create opportunity for manipulation by not tracing ODS back to their point of extraction
- ACR's stockpile definition may allow for internationally source gases to be stockpiled in the US and become eligible for crediting
- Developers are comfortable with current point of origin procedure, a change would require retraining
- Ecology should consider the benefits (additional eligible sources) vs. the costs (potential inability to identify gases that do not comply with eligibility criteria)

Topic 2: Foam Analysis procedure

How would this change impact foam destruction activities? Does this meaningfully reduce developer costs? Does this meaningfully reduce quantification rigor?

- Change is something developers have been looking for due to the high cost of sampling
- Guidance is needed on manufacture specifications - can aggregate specs be used? Can independent sources be used for foam composition information?

Taken together with other foam revisions discussed (revised leak rates, additional eligible substances) do these revisions change the financial viability of foam destruction?

- This change would improve the financial model but unsure whether it makes them viable
- Even with these changes, ACR's protocol has still not been widely used for foam destruction
- Wouldn't expect number of projects to change. These may be one-off projects
- There may be an opportunity for developers to partner with others to make an expensive voluntary process less expensive

Should Ecology adopt ACR's foam sampling approach?

- Consensus for yes

Topic 3: Allow ODS destruction outside of the US

What additional context or considerations related to this topic should Ecology be aware of?

- Moving ODS internationally is considered hazardous waste, which requires compliance with international treaties and incurs costs and delays
- The TEAP document is not a standard, rather a recommended minimum action to be adopted by countries
- Halon destruction may only be possible outside the US
- Other countries will not have the same stringency for destruction as in the US
- Washington would need to play an oversight role of international destruction

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?

- Halons and SF6 are difficult to find destruction capacity for within the US.

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?

- No – TEAP standards are not as rigorous as US destruction facility requirements

Should Ecology allow ODS destruction outside of the US?

- Near consensus for no

Topic 4: ODS sourcing from Canada

What additional context or considerations related to this topic should Ecology be aware of?

- RMC program does not place a levy on cfc's. Only on HCFCs and HFCs are subject to the levy
- This change poses an additionality concern as the RMC program already incentivized destruction of CFC's

Can WA state credit issuance for destruction of refrigerants eligible for Canada's RMC program be considered additional?

- Participation in a project stewardship program in Canada is required
- Crediting for RMC eligible gases poses additionality concerns
- Counterfactual of reuse may not be realistic, destruction through RMC program may be the most reasonable counterfactual for ODS that would receive offset credits

Should Ecology allow ODS destruction from any ODS sourced from Canada? Should Ecology allow ODS destruction from RMC ineligible ODS sourced from Canada?

- Consensus for no