

PUBLIC COMMENT TEMPLATE



The *Emission Reduction Measurement and Monitoring Methodology for Destruction of Ozone Depleting Substances and High-GWP Foam* was posted for public comment from May 2 – June 3, 2016. Public comments and responses are provided via the below template.

Following public consultation, the methodology will be submitted to an expert scientific peer review panel. Please note that public comments received are paraphrased in this response document. Please see the full comment from each commenter for more detailed information.

1. Introduction

Comment	Commenter	Author Response	Author Changes to Methodology

2. Eligible Activities/Eligibility

Comment	Commenter	Author Response	Author Changes to Methodology
U.S. territory eligibility for refrigerant gas	Steve Mandracchia – Hudson Technologies	The methodology is applicable to ODS/high-GWP foams originating in the U.S. and its territories.	None needed.
Refrigerant gas sourced from the U.S. federal government should not be eligible because ODS is subject to destruction by the U.S. government as part of its existing commitment to responsible waste disposal.	Steve Mandracchia – Hudson Technologies	We are not aware of any requirement that mandates destruction of used refrigerant or high-GWP foam from U.S. government operations. We are aware of select circumstances where destruction	None needed.

Comment	Commenter	Author Response	Author Changes to Methodology
		of used ODS has been cited as an option for disposal but there is not a binding mandate across federal government operations. Therefore, federal government ODS and high-GWP foam should be eligible. We will raise this issue during peer review for additional investigation, if necessary.	
Project Start Date – is the January 1, 2003 project start date correct?	Steve Mandracchia – Hudson Technologies	That is not an accurate start date. Start date requirements will be updated in a revised version of the methodology.	To be determined, however, start date requirements will be updated in a revised version of the methodology during the peer review process.
Eligibility of Halon 1211 and 1301 – 3M agrees that Halon 1211 and 1301 should be eligible for destruction credit and that Halon 1301 stockpiles should not be eligible.	Kurt Werner – 3M		None needed.
The methodology should clarify the reason for halon system decommissioning may be for the purpose of replacing the agent with a low GWP alternative or because the system is at the end of life.	Kurt Werner – 3M	The methodology acknowledges the eligibility of halon systems pending certain requirements (such as decommissioning/permanent retirement). The specific reason for such retirement is not a requirement.	None needed.
The methodology should not allow credit for halon systems that are decommissioned and subsequently replaced with a system that uses an HFC for fire suppression.	Kurt Werner – 3M	The project scenario does not include a requirement to monitor technology deployment that has no connection to carbon offset project activities. The concept of substitute emissions is included in the methodology and results in a deduction for the weighted average emissions that will be generated through the use of new systems that replace a	None needed.

Comment	Commenter	Author Response	Author Changes to Methodology
		decommissioned fire suppression system.	
(The methodology should) insure that the calculation considers replacement options in ways that incentivize alternatives (i.e. replacement fire suppression systems) with GWP less than 1. The draft methodology assumes replacement with an average of current market share replacement options, including HFC products which under leverages the potential impact of this change.	Kevin Hagen – Iron Mountain	The project scenario does not include a requirement to monitor technology deployment that has no connection to carbon offset project activities. The concept of substitute emissions is included in the methodology and results in a deduction for the weighted average emissions that will be generated through the use of new systems that replace a decommissioned fire suppression system.	None needed.

3. Project Boundaries

Comment	Commenter	Author Response	Author Changes to Methodology

4. Quantification of GHG Emission Reductions

Comment	Commenter	Author Response	Author Changes to Methodology

5. Monitoring, Data Collection, Verification

Comment	Commenter	Author Response	Author Changes to Methodology
Point of Origin Requirements in Section 6.2(c)(1) and 6.2(c)(2) – See full public comment from	Steve Mandracchia	These sections remain consistent with the current CARB ODS Protocol and have been	None needed.

Comment	Commenter	Author Response	Author Changes to Methodology
Hudson Technologies for specific issues cited	– Hudson Technologies	followed satisfactorily by multiple project proponents in numerous ODS destruction projects. We therefore do not plan to make any changes to either section.	
Medical Aerosol ODS Point of Origin requirements – We submit that in all cases in which ODS is contained in an MDI, the PoO should be the place where the propellant is recovered from the MDIs and the ODS aggregated. In the case of bulk ODS stockpiled by the MDI producer and that has never been placed into an MDI, the PoO should be the location of the MDI producer’s stockpile.	Steve Mandracchia – Hudson Technologies	Medical Aerosol ODS PoO requirements are consistent with other ODS sources. In the case of stockpiled medical aerosol ODS (a stockpile existing for more than 24 months prior to acquisition by the project proponent), PoO will be the location of the stockpile.	None needed.
Section 6.2(b)(2)(A) – Should the words “greater than or equal to” be deleted?	Steve Mandracchia – Hudson Technologies	No, this is accurate. This stipulates that the PoO is the location where smaller volumes are aggregated to the 500 lb or greater threshold.	None needed.

Appendix A: Emission Factors

Comment	Commenter	Author Response	Author Changes to Methodology
Emission rates for halon fire suppression systems should be 100% due to the closed nature of these systems (i.e. they may not have a meaningful leak rate and are designed to fully discharge, in times of use).	Kurt Werner – 3M	While these closed systems are not designed to leak, information on leak rates is available and employed in the methodology. The emission rate associated with halon systems is calculated across all source types consistently and is therefore conservatively calculated using the expected 10-year emission rate rather than a 100% value.	None needed.

Comment	Commenter	Author Response	Author Changes to Methodology
(The methodology should) insure that the destruction emission credit adequately reflect a total flooding event as business as usual. Currently, the methodology relies solely upon leak rate factors that may not represent the more realistic total flooding event. The risk to the atmosphere is primarily reflected when the total volume of Halon is released. The emission factor calculations need to reflect this and account for the value of eliminating this eventuality.	Kevin Hagen – Iron Mountain	While these closed systems are not designed to leak, information on leak rates is available and employed in the methodology. The emission rate associated with halon systems is calculated across all source types consistently and is therefore conservatively calculated using the expected 10-year emission rate rather than a 100% value.	None needed.

Appendices B & C: Mass and Composition Analysis

Comment	Commenter	Author Response	Author Changes to Methodology

Appendix D: Discussion and Rationale for CARB ODS Protocol Updates

Comment	Commenter	Author Response	Author Changes to Methodology