

PUBLIC COMMENT TEMPLATE

SUMMARY AND RESPONSE TO PUBLIC COMMENT

A new Ozone Depleting Substances methodology entitled The Destruction of Ozone Depleting Substances from International Sources was developed by the American Carbon Registry (ACR) and Tradewater, LLC.

All new methodologies and methodology modifications, whether developed internally or brought to ACR by external parties, undergo a process of public consultation and scientific peer review prior to approval.

The methodology was posted for public comment during the period July – August 2019.

A [*Methodology for the Quantification, Monitoring, Reporting and Verification of Greenhouse Gas Emissions Reductions and Removals from the Destruction of Ozone Depleting Substances and High-GWP Foam from International Sources*](#) was prepared by ACR. Version 1.0 of the methodology was posted for public comment in July 2019.

2 Eligible Activities: Quantification Methodology

Comment	Author Response
Page 11, 2.1: Revise “insulation foam must be <u>destruction</u> at either:” to “insulation foam must be <u>destroyed</u> at either:”	We disagree with the suggested edit. The selected clause is part of a series and using “destroyed” in place of “destruction” is not correct.
Page 12, 2.2: Add an oxford comma after “high-GWP foam blowing agents” in I.	Comma added.
Page 13-15, 2.2.1, III.: Instructions are quite complicated and subject to misinterpretation or confusion. Recommend mentioning the intent of this section upfront in an introduction paragraph and then including some type of graphical form of the information (e.g., flow chart).	We have added to section 2.2.1 III a paragraph regarding the intent of this section and will add a flow chart upon conclusion of peer review.
Page 16, 2.2.2: CFC-11 and CFC-12 have historically been used as refrigerants but CFC-12 is not used as a blowing agent.	HCFC-141b production/importation remains significant in certain locations. Additionally, no safeguards to prevent perverse incentives have been

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<p>HCFC-141b is also a commonly used ODS blowing agent. Why is HCFC-141b excluded from the methodology as an ODS blowing agent?</p>	<p>included in the methodology and therefore, HCFC-141b is not included as an eligible foam blowing agent.</p>
<p>Page 16, 2.2.2: It is confusing that the methodology refers to CFC-11 and CFC-12 as both “ODS refrigerants” and “high-GWP blowing agents.” The methodology uses the terms “ODS” and “high-GWP” as if they were different when they are referring to the same substances. While it is true that ODS refrigerants and blowing agents have high GWPs, that is not how they are defined. They are defined as ODS given their ODP and the fact that ODS reported separately under the Montreal Protocol and not at all as GWP gases under the Kyoto Protocol. The term “high-GWP” on its own typically refers to a non-ODS (e.g., HFC). Thus, referring to the eligible materials as “high-GWP blowing agents” may infer that HFCs are eligible blowing agents under the methodology.</p> <p>Furthermore, “high-GWP” is never defined in the methodology, i.e., what is high-GWP (e.g., relative to what value)?</p> <p>Recommend referring to these substances consistently throughout as either ODS only and not high-GWP, e.g., “ODS blowing agents” and “ODS refrigerants.” Could also refer to substances as both ODS <i>and</i> high-GWP. Either way, suggest using consistent terms throughout to mitigate any confusion around what substances are eligible under the methodology.</p>	<p>These terms are consistent with ACR’s U.S. ODS destruction methodology. We have maintained the use of these terms to remain consistent with that methodology.</p> <p>CFC-11 and 12 are referred to as both “ODS refrigerants” and “high-GWP blowing agents” to acknowledge the source and appropriate quantification, monitoring, and sampling necessary dependent on whether the source is a refrigerant or a blowing agent. We would also like to maintain usage of the term “high-GWP blowing agent” in the event that the methodology is expanded to include non-ODS sources (such as HFCs) in the future.</p> <p>The term high-GWP is simply an acknowledgement that the eligible species included in the methodology have significant GWPs. This term is not meant to be comparative.</p>

Definitions

Comment	Author Response
<p>Page 49, High-GWP Foam Blowing Agent: This definition indicates that HFCs are included in the definition of “high-GWP” blowing agent, when in fact the methodology is solely inclusive of ODS blowing agents. Recommend revising this definition to exclude any reference to HFCs if they are not eligible under the methodology. For example:</p> <p>ODS Foam Blowing Agent: ODS entrained in insulation foam that was used in manufacture of the foam to provide insulation, structural, and other performance properties. These substances may also have a high GWP and are eligible under this methodology.</p>	<p>The definition of High-GWP Foam Blowing Agent has been changed to the following:</p> <p><i>ODS entrained in insulation foam that was used in manufacture of the foam to provide insulation, structural and other performance properties. The eligible ODS included in this methodology have high GWPs.</i></p>
<p>Page 49, High-GWP Foam Blowing Agent: Recommend adding a new definition for high-GWP, non-ODS blowing agents. For example:</p> <p>High-GWP, Non-ODS Foam Blowing Agent: These substances are non-ozone depleting foam blowing agents that have a high GWP, e.g., HFC-245fa, HFC-134a. These substances are not eligible in this methodology.</p>	
<p>Page 49, High-GWP Foam Blowing Agent: Recommend adding a new definition for reclaimed material and move the information about reclaimed material from this current definition to the new defined term. For example:</p> <p>Recovered/Reclaimed Foam Blowing Agent: Foam blowing agent can be recovered from foam, reclaimed to meet virgin refrigerant specifications</p>	<p>We have removed reference to reclaimed material in the definition as reclamation is not a focus of the methodology.</p>

Comment	Author Response
(e.g., AHRI Standard 700), and then sold and used as a refrigerant.	

Appendix D: International ODS Destruction and HCFC-22 Eligibility

Comment	Author Response
Page 62: Footnote 7 is missing from the bottom of the page. ICF report that is being referenced is not cited.	Footnote 7 has been added.
Page 63: Update parenthetical to “(e.g., commercial, industrial, automotive, household appliances)”	Revision made.

Appendix E: Preventing Perverse Incentives

Comment	Author Response
Page 67, c: The methodology would not be applicable for some portion of HCFC-22 being produced after the date of adoption of version 1.0. Because the majority of recoverable HCFC-22 refrigerant will originate from Montreal Protocol Article 5 countries, the methodology should be updated in the future to allow that material to eventually become eligible.	Agreed. The methodology will be updated to allow for additional sources in the future.

Appendix F: References

1 st Peer Review	Author Response
ICF (2008), cited on pages 63 and 64, is missing from the references list.	ICF reports have been added to the references list.