



Agenda for Ozone Depleting Substances (ODS) Technical Working Group Meeting 3

May 17, 2024 | 8:00 am – 10:00 a.m.

Location: Virtual (Zoom), open to the public.

Welcome, overview of meeting agenda and logistics

- Brief overview of survey responses

Topic 1: Revise substitute emissions factors

Ecology will present a considered protocol revision **substitute emissions factors for refrigerants**, as well as alternatives including:

- Removing substitute emissions factors, reflecting a baseline of stockpiling

Discussion Questions:

- What additional context or considerations related to this topic should Ecology be aware of?
- Should substitute emissions factors reflect retrofitting of existing equipment or refrigerants founds in new replacement equipment?
- Should substitute emissions factors that assume substitution of CFC's with HCFC's that have now phased out be updated to reflect a different refrigerant?
- Do the refrigerant use applications assumptions in the protocol reflect current practices?
- Does this change contribute to Ecology's programmatic goals of this rulemaking:
 - Reflect advances in policy and scientific understanding
 - Remove unnecessary project development barriers, inefficiencies, and exclusions
 - Increase methodological rigor

Topic 2: Revise federal sourcing prohibition

Ecology will present a considered protocol revision to allows **ODS sourced from the federal government**, as well as alternatives including:

- Allowing only ODS sourced from Dept. Of Defense auctions
- Allowing ODS sourced from the federal government with some specific exclusions such as material seized from US Customs

Discussion Questions:

- What additional context or considerations related to this topic should Ecology be aware of?
- Are there significant federal ODS sources outside DLA and customs seizure?
- Without a specific prohibition on ODS from customs seizures, would these be eligible in the current protocol?

- Is a prohibition on ODS sourced from strategic stockpiles needed for substances besides halons?
- Are there reasons to specifically exclude the federal government as a *project developer*?
- Does this change 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

Topic 3: Invalidation liability restriction

Ecology will present a considered protocol revision to restrict invalidation liability **to invalidation events that impact ODS handling, destruction, or emissions from ODS processing.**

Discussion Questions:

- What additional context or considerations related to this topic should Ecology be aware of?
- Is this a meaningful change in invalidation liability at ODS destruction facilities?
 - Are concurrent unrelated activities at destruction facilities common?
- Would this change impact project verification activities?
- Would this change be anticipated to significantly impact either developer or buyer decisions?
- Does this change 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

Topic 4: Approach to discussion of additional substances in next meeting

Ecology will present a proposed approach to discuss the consideration of additional substances in the next meeting. Ecology is seeking input on whether this grouping of substances is appropriate and logical, and if there are additional substances that Ecology should consider for this discussion.

- Group 1: Additional refrigerants
 - HCFC-22, HCFC-123*
- Group 2: Additional foams
 - HCFC-142b, HFC-134a*, HFC-245fa*, HFC-365mfc*
- Group 3: Medical Aerosols
 - CFC-11, CFC-12, CFC-114, HCFC-22, HCFC-142b
- Group 4: Unused solvents
 - CFC-11, CFC-113, HCFC-123*, HCFC-141b, HCFC-225ca, HCFC-225cb
- Group 5: Fire Suppressants
 - Halon 1211, Halon 1301

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

Next meeting: June 4th, 2024, 8 am – 10 am (Pacific Time)

- Contact Jordan Wildish at CCAOffsets@ecy.wa.gov or 360-280-6488
- [Ozone Depleting Substances Technical Working Group webpage](#)
- [Cap-and-Invest Offsets webpage](#)
- [Comment on the Chapter 173-446 WAC: Cap-and-Invest Offsets Rulemaking](#)
- [CARB Offset Taskforce Report](#)
- [CAR ODS 2.0 Substitute Emissions Calculations \(Section 5.2.1; Table D.3: D.8\)](#)
- [CAR ODS 2.0 federal sourcing point of origin requirements \(Section 6.2\)](#)
- [ACR ODS 2.0 Eligible Substances \(Section 2.2.1: 2.2.5\)](#)