

### SUMMARY AND RESPONSE TO PEER REVIEW COMMENTS

The Methodology for **The Destruction of Ozone Depleting Substances and High-GWP Foam** was updated from version 1.2 to 2.0 by the American Carbon Registry (ACR).

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 from June 13, 2022, to July 13, 2022. The methodology was reviewed by an independent panel of experts beginning October 4, 2022. Comments and responses are documented here.

#	Reviewer #	Document Section	Reviewer Comment	Author Response	Reviewer Comment (R2)
1	3	Overall	I am very supportive of the expanded eligibility to include HCFC-22 refrigerant and high-GWP HFC foams. Overall, I think the authors did a great job editing the methodology and responding to the initial round of reviewer feedback.	Acknowledged.	Thank you.
2	2	Overall	Supporting the fast phasedown/phaseout of f-gases, by including HCFC-22 refrigerants and high-GWP HFC foams, is worthwhile, and I support it.	Acknowledged.	Confirmed.
3	2	1.1	Our climate system does not recognize borders. Banks of ODS and high-GWP HFCs are one of the most important sources of short-lived super climate pollutants that can be captured and destroyed. I support the expansion to include Canada and encourage you to include additional locations contingent upon ratification	Acknowledged.  ACR has a separate International ODS destruction methodology that is currently being revised to include more ODS and other high-GWP halogenated compounds for destruction.	Confirmed.

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			of the Kigali Amendment to the Montreal Protocol.		
4	3	1.1; 3.2	Why not expand location eligibility to all countries that are parties to the Montreal Protocol and which have ratified all amendments, including the Kigali Amendment capping HFC production and consumption? Within these countries, production and consumption are controlled. 2022 was the last baseline year for HFC production levels Article 5 (developing country) group 1 parties, including China. That means the projects could still meet the additionality bar, since it's no longer possible to just make new stuff to replace the amounts destroyed (provided that individual countries did not require destruction, and that there is no re-manufacture	Acknowledged.  ACR has a separate International ODS destruction methodology that is currently being revised to include more ODS and other high-GWP halogenated compounds for destruction.	Congratulations on your work to revise the other methodology too. I'd welcome the chance to look at that one too when it's ready.

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			<p>allowances in exchange for destruction.)</p> <p>From an environmental justice standpoint, it makes sense to expand eligibility. Most of the products sold in least developed countries (e.g. many places in Africa) originate in countries that are more developed, such as Korea, Japan, China, or the USA. Refrigerants and blowing agents from insulation foams in less-developed countries will almost certainly be emitted without incentive to collect and destroy them. Why should these developing importer countries be excluded from qualification, when the source of their contamination is the products coming from the US and other more developed countries in the first place?</p>		

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5	2	2.1	<p>It is important to look at the big picture to determine the appropriate DRE. Consider the origins of the TEAP DRE ratings: The framers of the Montreal Protocol on Ozone Depleting Substances envisioned the possibility that it might be necessary to provide virgin chemicals for some specialty uses where utilization of used chemical was impractical or undesirable. For these limited cases, they included a provision allowing for re-manufacture of virgin product, so long as an equal or greater amount of old substance was destroyed. They also needed to know, for reporting and compliance purposes, the quantities of ODS actually destroyed. (Amounts destroyed factor into the formulas for determining countries' production and consumption</p>	<p>Minimum DRE of 95% has been added for ODS and High GWP HFCs destroyed from intact foams (this is the only dilute source mentioned in the TEAP report).</p>	<p>Good change.</p>

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			<p>baselines, and compliance with the phaseouts and phasedowns). Hence the eventual elaboration of rigorous destruction and removal efficiency ratings, and TEAP recommendations. The use case here is different. Setting too stringent a destruction efficiency level will result in disqualification of potentially viable and cost-effective destruction facilities (e.g. certain cement kilns) that would be perfectly fine for carbon credit generation.</p> <p>Given how few foam destruction projects have been contemplated—let alone completed—under this methodology, it is far better to have many eligible, cost-effective destruction facilities than to set the bar out of reach. If you want to be extra conservative, you could add</p>		

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			<p>an additional discount rate for facilities with lower DRE (such as a 5% penalty or reduction in credit below the TEAP's estimated DRE) for good measure.</p> <p>Do not let perfect be the enemy of good: allow destruction in as many viable facilities as possible, or the status quo will continue to be that foams are landfilled and eventually emit their blowing agent to the atmosphere because it was too costly or difficult to destroy them.</p>		
6	3	2.1	I support inclusion of destruction facilities outside of the USA. As other commentors have noted, there is limited capacity within the US and this could increase project cost-effectiveness.	Acknowledged.	Confirmed.
7	3	2.1	I question the necessity of using destruction facilities	Minimum DRE of 95% has been added for ODS and High GWP HFCs	Thank you. I agree with the changes made.

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			<p>that meet the Montreal Protocol Technology and Economic Assessment Panel (TEAP) 99.99% destruction and removal efficiency (DRE) level (2.1.1), at least for intact foams and other dilute sources, and fear that doing so will reduce the likelihood and economic viability of projects using this methodology. That might be even be considered more stringent than TEAP recommended to the Parties to the Montreal Protocol.</p> <p>As explained on page 1 of the 2018 Decision XXIX/4 TEAP Task Force Report on Destruction Technologies for Controlled Substances, “The DRE must be a minimum of 99.99% for concentrated sources or 95% for dilute sources.” (link: <a 265="" 494="" 721="" 879"="" href="https://ozone.unep.org/sites/default/files/2019-04/TEAP-&lt;/a&gt;&lt;/p&gt; &lt;/td&gt; &lt;td data-bbox="> <p>destroyed from intact foams (this is the only dilute source mentioned in the TEAP report).</p> <p>Mixed ODS and High GWP compounds cannot be considered dilute sources because each compound in the mix is a concentrated source eligible for generating carbon offsets upon destruction.</p> </a></p>		



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			<p>DecXXIX4-TF-Report-April2018.pdf)</p> <p>I believe the 95% dilute source level is more appropriate for bulk (in-tact) foams, and possibly even for diluted (e.g. contaminated or mixed ODS and high-GWP foam blowing agent) refrigerant, solvents or blowing agents.</p> <p>At a minimum, this standard should clarify what is considered concentrated vs. diluted sources, and align diluted source destruction standards with the 95% recommendation to expand the availability of cost-effective facilities for destruction (i.e. cement kilns). The current definition for “mixed ODS or high-GWP foam blowing agent” (page 50) could be used as a proxy for diluted sources.</p>		

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8	1	2.1.I	There's a typo in the first sentence, "The end fate of the ODS, high-GWP foam blowing agent, or high-GWP insulation foam must be <b>destruction</b> at either:", emphasis added.	No typo found. "Destruction" is spelled correctly.	Agreed. I misread this statement during initial review.
9	3	2.2.VII.F	Given the extra steps (labor cost) involved, and the small quantities recovered from household appliances, is it really necessary to require the "serial, tracking or ID number of all appliances from which high-GWP foam blowing agents are extracted and destroyed in an enclosed equipment de-manufacturing system"?	Section 2.2.VII.F is removed.	Thank you.
10	2	2.2.1.I, and 2.2.2 -1	Consider wording this differently: "eligible refrigerants [or foams] must be recovered from equipment, systems, or other supplies that were legally sold in regions deemed eligible under this	Following sections are reworded as follows.  2.2.1.I Eligible refrigerants must originate from equipment, systems, or other supplies <b>legally sold for use</b> in the United States or Canada.	This resolves the issue.

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			<p>methodology.”</p> <p>Much refrigerant and foam insulation legally sold in the USA and Canada “originates” in China or other countries where pre-charged appliances and products are manufactured. This re-wording will prevent potential confusion about eligibility of refrigerants and foams recovered from legally imported products that originated elsewhere.</p>	<p>2.2.2.I Eligible high-GWP insulation foam must originate from appliance foam, building foam, or other foam <b>legally sold for use</b> in the U.S. or Canada.</p>	
11	3	2.2.1.I; also 2.2.2 (1)	<p>This section currently reads: “Eligible refrigerants must originate from equipment, systems, or other supplies in the United States or Canada. Imported refrigerant (from countries other than U.S. or Canada) is not eligible under this Methodology.”</p> <p>However, not all products containing refrigerant and</p>	<p>See response for comment 10.</p>	<p>Thank you.</p>

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			<p>foams are made in the USA. Many if not most domestic AC and appliances are imported, pre-charged. In other words, the refrigerant (and foam) in them is “imported.” Ditto with building insulation.</p> <p>This section should be clarified to explain that refrigerant or foam recovered from products that were legally imported for sale in the US and Canada are eligible.</p>		
12	2	2.2.1.III	Consider expanding eligibility to all controlled high-GWP F-gases in this or future versions of the methodology.	This will be considered in a future version of this methodology.	Noted with appreciation.
13	3	2.2.1.III	What is the logic to excluding other controlled ODS and HFC refrigerants that don’t appear on this list? Put another way, why give credit to high-GWP HFCs destroyed from foam, but not from	The reason for including high-GWP HFC destruction for foam sources only is because recovery of blowing agents from end-of-life foam is expensive and not a common practice in the US and Canada. This results in most end-of-life foam being	Thank you for the explanation.

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			refrigerant? Source doesn't matter to the earth's climate.	<p>disposed in landfills and hence all entrained blowing agents eventually leak into the atmosphere.</p> <p>High-GWP HFCs from other sources are not eligible for destruction because virgin HFCs can still be produced, imported, and consumed in the US and Canada. Used HFCs from these sources can be economically recovered and reclaimed for reuse. ACR has a separate methodology that allows reclaimed HFCs to generate carbon credits once they are sold for reuse.</p>	
14	1	5.III	There's a typo in this section, tables is plural in "Tables 4".	Typo corrected.	Resolved.
15	1	6.1.V	This section states "For projects destroying refrigerant ODS sourced from government stockpiles or inventories, the project proponent must maintain documentation <b>that the ODS could be sold into commercial markets</b> , and that the ODS is not required	<p>Section 6.1.V reworded as follows.</p> <p>For projects destroying refrigerant ODS sourced from government stockpiles or inventories, the project proponent must maintain documentation that the ODS is not required to be destroyed or converted.</p>	Resolved.

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			to be destroyed or converted.” –emphasis added. The requirement that government stockpiles be eligible to be sold into commercial markets was removed from section 2.2.1 II per one of the public comments and therefore is no longer relevant here.		
16	3	6.1.IX.B	<p>This section on monitoring says that for intact appliance high-GWP foams, the numbers of units containing high-GWP foam processed must be recorded. I worry this would exclude potential stockpiles of foam already extracted from appliances that have been scrapped or recycled.</p> <p>Perhaps more importantly, it also says the type and amount of appliance foam blowing agent in the foam must be recorded, as</p>	<p>To overcome the high cost of manual segregation and lab testing of foams (especially for appliances and stockpiles) to determine type and amount of blowing agent, following alternate methods are added.</p> <p>Manufacturer specifications (for appliances) and bill of materials (for buildings) that show the type and quantity of foam product(s) used may be provided as evidence for type(s) of blowing agent(s) contained in the foam(s).</p> <p>In lieu of lab tests to determine the amount of remaining blowing</p>	This change increases the likelihood that projects including the noted applications will be successfully completed.

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			determined through procedures in Appendix B II. (page 37). But Appendix B section II doesn't appear to explicitly include provisions for appliance foam: it talks about foams removed from buildings, walk-in coolers, refrigerated transport, pipes and marine applications, etc. but not appliances like domestic refrigerators. This oversight should be resolved, so that it is more feasible to document and destroy stockpiles of insulation foams removed from appliances (e.g. old refrigerators and freezers), ideally without having to individually test every single little scrap of foam.	<p>agent(s) in recovered and stockpiled foam(s), default end of life emission rates published by the US EPA in the most recent US GHG Inventory may be used to quantify the amount of blowing agent(s) remaining in different categories of foam products at their EOLs. If the stockpile is older than a year, annual leak rate shall be deducted (for each 12-month year) from the disposal emission rate.</p> <p>This alternate approach would result in conservative estimates because the "Loss at Disposal rate" or EOL emission rate in the US GHG Inventory is estimated assuming that all foam products will be used for entirety of their "leakage lifetimes" or useful lifetimes. In reality, many foam products are disposed of before the end of their useful lifetimes.</p>	
17	3	6.3	I agree with the decision to eliminate the quarterly calibration requirement, replacing it with a requirement that calibration	Section 6.3.1.A is removed.	Confirmed.

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			<p>happen within six months of the project date instead, in response to the first round of reviewer comments. Is it still necessary to include the quarterly inspection requirement under 6.3 (1)A, given the new requirement in 6.3 B? Perhaps the quarterly inspection requirement should be eliminated if it's unattainable/unverifiable in practice.</p>		
18	1	6.3.I.B	<p>Recommendation: add additional clarification to the statement that scales be calibrated “at least within six months of project start date to 5% or better accuracy”. Based on experience with other methodologies this can be interpreted as six months before or after the project start date. Depending on the intent of this requirement it could be better clarified to whether the calibration must</p>	<p>Section 6.3.I.B is modified as follows.</p> <p>“Properly calibrated <b>and inspected</b> per the destruction facility’s RCRA permit, or for non-RCRA facilities, calibrated <b>and inspected</b> as required by the governing permit and at least within six months <b>prior to the</b> project start date to 5% or better accuracy. RCRA facilities that do not have calibration requirements defined in their RCRA permits must calibrate <b>and inspect</b> scales at least within six</p>	Resolved.



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			be prior to the start date, or if after the start date is acceptable.	months <b>prior to the</b> project start date to 5% or better accuracy.”	
19	1	6.4.II.C and Appendix C I.A.ii and iii	It appears that the term “CEMS data” has been removed from some sections of the methodology (since the previous version), notably section 6.1. There are still references to “CEMS data” in section 6.4.II.C and Appendix C I.A.ii and iii. If the removal of “CEMS data” from other sections was intentional, you may consider removing or revising that term from the remaining sections as well for consistency.	The term “CEMS” is replaced with “Continuous Emissions Monitoring” for section 6.4.II.C.  References to CEMS data are removed from Appendix C.I.A.ii and iii.	Resolved.
20	2	Table 4	20-year GWPs should be used instead of 100-year GWPs for short-lived climate pollutants, including ODS and HFCs. Through 2050, mitigating short-lived climate pollutants like HFCs, black carbon, and methane can	ACR fully agrees that there is an urgent need to lower emissions of SLCPs to address global warming in the short term and to also help meet the myriad net zero targets.  The 20-year GWP values do show that the magnitude of warming that	If we assume that the contribution of CO <sub>2</sub> to warming remains constant, using a 20 yr GWP would give SLCPs a higher value over 20 years, to reflect that there is a premium on slowing warming during this 20 year period to limit over-

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			<p>avoid 2-6 times as much warming as cuts in CO2 alone (link: <a href="https://www.ccacoalition.org/en/news/top-scientists-reducing-short-lived-climate-pollutants-key-keep-warming-below-2%CB%9Ac">https://www.ccacoalition.org/en/news/top-scientists-reducing-short-lived-climate-pollutants-key-keep-warming-below-2%CB%9Ac</a>).</p> <p>The IPCC’s newest assessment report (the 6th) spends a considerable amount of time discussing the (in)appropriateness of using 100-year GWP values, depending on the use case. See, for instance, Chapter 6 on Short Lived Climate Pollutants, the discussion in section 1.5.4.1 on ‘fitness for purpose’ (“Since AR5, improved knowledge of the radiative properties, lifetimes and other characteristics of emitted species, and the response of the climate system, have led to updates to the numerical values of a</p>	<p>SLCPs cause in the first 20 years of release is much higher than that over 100 years.</p> <p>However, use of GWP-20 values in quantification of carbon offsets may not be accurate. Since GWP is a relative term that represents absolute GWP of a metric ton of GHG relative to absolute GWP of a metric ton of CO2 over a fixed period of time, the 20-year GWP for SLCPs like methane and HFC-134a would seem high because over 80% of methane or HFC-134a would have decayed in the first 20 years resulting in high absolute GWP (20 yr) while only around 30% of CO2 would have decayed in the same time resulting in low absolute GWP (20 yr). So, the resulting GWP-20 values would show the warming potential of methane or HFC-134a relative to only 30% warming potential of CO2, and hence seem inaccurately high. Post year 20, when SLCPs will trap a much smaller fraction of heat compared to the pre-20 years, CO2 will continue to trap</p>	<p>shooting 1.5C as much as possible, a guardrail that will be breached within a decade or less, speeding self-reinforcing climate feedbacks and pushing the planet past a cascade of irreversible tipping points. If anything, CO2 mitigation should be further de-valued over the first 20 years, as the primary strategy for reducing it—shutting down fossil fuel plants and shifting to clean energy—actually causes warming the first decade, is a wash at the 20 year mark, and even the most aggressive decarbonization only avoids a modest 0.1C at 2050. See Dreyfus et al: <a href="#">Mitigating climate disruption in time: A self-consistent approach for avoiding both near-term and long-term global warming.</a></p> <p>ACR: Agreed that SLCPs heat the planet at much higher rates (than GWP-</p>

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			<p>range of metrics...”), the summary on pages 1016-1017 about alternatives to 100-year GWPs, and Box 7.3, “Physical Considerations in Emissions Metric Choice.”</p> <p>To summarize, if a company or other entity is trying to achieve net-zero by mid-century, it could make more sense to use different metrics, like GWP-20 rather than 100-year GWPs, as California and other states have started doing. In particular, short lived climate pollutants’ climate forcing—their warming effect—is concentrated in the days to decades after their release. What is emitted in the 2020s, for instance, will have a strong warming impact for the next decade or two. These are the critical decades that will determine whether the self-reinforcing climate</p>	<p>heat at levels comparable to the pre-20 years. This results in 20-year GWP values not accounting for the actual global warming potential of CO2 and hence resulting in inaccurately high GWPs for SLCPs.</p> <p>While GWP-20 values are important to highlight that SLCPs trap heat at much higher rate in the short term and that emissions of SLCPs should be reduced more urgently, use of GWP-20 values in quantification of offsets is not accurate because it underestimates the warming potential of CO2.</p>	<p>100 values) in the short term and reducing their emissions should be prioritized in the short term. A better strategy (instead of using GWP-20 values) may be to highlight the benefits of reducing SLCP emissions in the short term and advocate for higher carbon prices for these added benefits over non-SLCP emissions.</p> <p>Additionally, 20-year GWPs for SLCPs cannot be used because the credits have to have common accounting - including within international crediting systems – to ensure fungibility in carbon markets.</p> <p>Closed.</p>

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			<p>feedbacks take over and push us past the many tipping points lurking beyond 1.5C. See background note for more details (link: <a href="https://www.igsd.org/wp-content/uploads/2020/09/Science-Supporting-Need-for-Fast-Near-Term-Climate-Mitigation-Sept2020.pdf">https://www.igsd.org/wp-content/uploads/2020/09/Science-Supporting-Need-for-Fast-Near-Term-Climate-Mitigation-Sept2020.pdf</a>)</p> <p>Using the 100-year GWPs dilutes and therefore disincentivizes destruction of short-lived pollutants. That is unfortunate, because it is the removal of these short-lived pollutants (ODS and HFCs included), that could actually provide cooling in the near-term and help us avoid catastrophic climate tipping points.</p>		
21	3	Table 4	The climate impact of short lived climate pollutants is concentrated in the days to decades after their release.	See response to comment 20.	Thank you for acknowledging that there is an urgent need to lower

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			<p>More and more, companies and governments—and even the IPCC—recognize the unique role that short-lived climate pollutants, including F-gases like HFCs, can play in forestalling the worst of the climate crisis. As such, they are using the more appropriate 20-year GWPs. This methodology should do the same.</p> <p>I think Mario Molina, the Nobel prize winning chemist whose warning saved the earth’s ozone layer, explained why best in this quote, published (link: <a href="https://www.project-syndicate.org/commentary/arctic-sea-ice-depletion-short-lived-climate-pollutants-by-mario-molina-and-durwood-zaelke-2020-10">https://www.project-syndicate.org/commentary/arctic-sea-ice-depletion-short-lived-climate-pollutants-by-mario-molina-and-durwood-zaelke-2020-10</a>) shortly before he passed away in 2020: Cutting CO2 isn't enough. "It is also vital to</p>		<p>emissions of SLCPs to address global warming.</p>

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			<p>slash emissions of so-called short-lived climate pollutants: methane, black carbon, hydrofluorocarbons (HFCs), and tropospheric ozone. Such action could mitigate six times as much warming as reductions in CO2 emissions by 2050. Overall, eliminating emissions of these super pollutants would halve the rate of overall global warming." See also this CCAC science summary (link: <a href="https://www.ccacoalition.org/en/content/why-we-need-act-now">https://www.ccacoalition.org/en/content/why-we-need-act-now</a>).</p> <p>I often reflect on how we got into this mess where everyone uses 100-year GWPs for everything, despite the fact that most climate goals are mid-century (i.e. 2050) goals and despite the fact that other metrics like GWP-20 are available. As one</p>		

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			<p>of the first CSA-certified GHG inventory quantifiers back in the early 2000s, I've seen this process evolve over the last two decades: countries started quantifying emissions using the now-outdated IPCC 4th assessment 100-year GWPs for the UNFCCC reporting process, companies followed along, then the reporting protocols standardized it, and soon we were all locked in to using a metric that's not the right tool for every job, and not responsive to changing scientific understanding of the imperative to mitigate short lived climate pollutants. It's so ingrained at this point it's difficult to right the ship. But we need to try.</p> <p>You could join other leaders moving to 20-year GWP for ODS and HFCs: Many leading states in the US have already</p>		

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			<p>recognized the importance of 20-year GWPs and acted: New York, for instance, reports with 20-year GWPs (see page 4, "...Shortening the time horizon over which the GWP is integrated increases the GWP of gases that are shorter-lived than CO2." California uses 20-year GWPs in its inventory of short lived climate pollutants in addition to the 100-year GWPs, and the State of Washington is using 20-year GWPs too (See page 20: "Consistent with the Governor's directive, the rule will require the assessment to use both 20-year and 100-year GWPs.") ACR can do the same. At least give people the option of using 20-year GWPs, if 20-year GWPs are consistent with their reporting and targets.            NY Link:  <a href="https://www.dec.ny.gov/doc">https://www.dec.ny.gov/doc</a></p>		



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			<p>s/administration_pdf/ghgsu mrpt21.pdf CA Link: <a href="https://ww2.arb.ca.gov/ghg-slcp-inventory">https://ww2.arb.ca.gov/ghg-slcp-inventory</a> WA Link: <a href="https://ecology.wa.gov/DOE/files/36/36bdb605-225d-4a74-9edd-8bc600714977.pdf">https://ecology.wa.gov/DOE/files/36/36bdb605-225d-4a74-9edd-8bc600714977.pdf</a></p>		
22	3	Table 4	<p>Table 4 contains the GWPs for eligible ODS and HFCs. I applaud the authors for endeavoring to use the most up-to-date science, as reflected by your incorporation of reviewer’s suggestion to update to the GWPs in the IPCC’s 5<sup>th</sup> Assessment Report. However, the IPCC’s 6<sup>th</sup> Assessment Report is now available, so you should be citing those GWP numbers as soon as possible.</p>	<p>ACR standard requires use of AR5 GWP values for projects with vintage 2021 onwards. Even though AR6 GWP values are already published, it will take some time before these new values start being commonly used. ACR will update its standard to require AR6 GWP values in the near future as these values become more commonly used.</p>	Acknowledged.
23	2	Appendix B II	<p>Be sure to explain how this verification method should</p>	<p>See author response to comment 16.</p>	Acknowledged.

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			work for foams recovered from appliances too.	Sections 6.1.IX.C and D added to provide alternative methods to quantify <b>type</b> of blowing agent and <b>amount</b> of blowing agent entrained in the foams (recovered from appliances and buildings) that are sent for destruction.	
24	1	Appendix C.I.C.ii And Appendix C.I.G.v	Appendix C.I.C.ii specifies requirements for U.S. and Canadian destruction facilities—"fully evacuated sample bottle that meets applicable DOT (or equivalent in Canada) requirements"—but not for other countries. Consider including equivalent requirements for other countries, if any. The same comment applies to Appendix C.I.G.v. The definition of container also references only the U.S. and Canada. This clarification would be helpful as a reference during project validation/ verification if V-V body requests evidence that	<p>Section Appendix C.I.C.ii revised as follows.</p> <ul style="list-style-type: none"> <li>ii. Samples must be taken with a clean, fully evacuated sample bottle that meets applicable DOT requirements in the U.S., or equivalent requirements in Canada (or another country if the destruction facility is located outside U.S. and Canada), with a minimum capacity of one pound;</li> </ul> <p>Following text (in bold) added to Section Appendix C.I.C.v</p> <ul style="list-style-type: none"> <li>v. ....equivalent agency in Canada, <b>or equivalent agency in another country (if the transfer takes place outside U.S. and Canada in the process of transporting the ODS or high-GWP blowing agent for destruction at a destruction</b></li> </ul>	Resolved.

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			the project meets transportation requirements (if any).	<b>facility outside U.S. and Canada)</b> for that ODS or high-GWP blowing agent;	