



April 25, 2012

Rachel Tornek
Climate Action Reserve
523 W. Sixth St., Suite 428
Los Angeles, CA 90014

RE: Public Comments Regarding the Draft US Ozone Depleting Substances Project Protocol Version 2.0

Dear Rachel:

Environmental Credit Corp. appreciates the opportunity to provide comments on the draft Version 2.0 update to the CAR US ODS Project Protocol. As you know, Environmental Credit Corp. has undertaken seven registrations to date under the current protocol and continues to implement additional destructions of ODS. We appreciate the Reserve's efforts to improve the protocol's functionality, practicality, and quality. We hope that the following comments will prove helpful.

Our comments are listed below and reference specific red-lined sections from the draft "Version 2.0 for Public Comment" dated April, 2012:

- Section 2.3 (and Table 8.3 Item 2.2): "ODS Sources not in one of the above categories, such as ODS that were produced for, used as, or intended for use as solvents, medical aerosols, or other applications are not eligible under this protocol"
 - ECC recommends the removal of the words "or intended for" in the above excerpt
 - ECC appreciates and supports the desire to exclude ODS which was actually used in solvent applications. However, we believe that it is impossible to determine whether ODS which was not actually utilized in solvent applications was intended to be used in such applications. This language would place an impossible burden on verifiers and project developers to determine intent.
- Section 5.3: Deduction for Vapor Composition Risk
 - ECC recommends removing this section in its entirety
 - After review of the potential magnitude of the risk of over-crediting due to differences between liquid samples and actual contents, ECC does not believe that the this deduction is necessary or useful.
 - Under the revised verification requirements, verifiers are required to insure that source and eligibility documentation for container contents match up to reported liquid samples. This process should ensure that large deviations between actual contents and sampled contents do not occur.
 - Further, after review of the charts presented by CAR staff at the April 10th Public Workshop, it is apparent that the risk addressed in this section is



only potentially material (although as noted above, verification should remove this risk) in cases where tanks are delivered substantially less than full (cited examples included tanks capable of holding approximately 33,000-35,000 lbs of materials which were filled with 15,000 and 30,000 lbs). ECC believes that if CAR does move forward with this unnecessary discount, that it should not apply to tanks which are filled to capacity levels of 80% or more. Capacity and Fill, for this purpose, should be determined based on type and weight of materials rather than by direct volumetric measurement which may not be available or independently ascertainable. Capacity should be stated not as Total Water Capacity, but as the recommended 80% of Water Capacity adjusted for the specific density of the materials destroyed.

- Sections 6.4 and 6.6: Requiring that scales are within 1% accuracy
 - ECC believes that there is an opportunity to utilize an industry standard which instead would provide for a more conservative outcome as well as bringing the protocol into line with other types of facility requirements.
 - ECC's understanding is that the industry standard for scale calibration is that the scale be calibrated within 3 Grads in order to be "Legal for Trade". A Grad is one scale increment. To illustrate the impact of utilizing the 3 Grad requirements, consider a 100,000 lb. scale which is off by 1%. When measuring an example 50,000 lb. load (truck and full container), such a measurement could be off by 500 lbs. Utilizing a 3 Grad rule, the same 100,000 lb. scale, using 20 lb. increments, can be off by only 60 lbs. This appears to ECC to be a substantially more accurate rule, as well as being appealing from a simplicity perspective.
- Section 6.6: "The Technician must ensure that all valves between the container and the sample port are open"
 - ECC would propose the following wording instead: "4. The technician must ensure the sample is representative of what is contained in the vessel. All valves between the sample point and the vessel's interior must be open for a minimum of 15 minutes before the sample is taken."
- Section 6.6.1: "The container must have sampling ports to sample liquid and gas phase ODS"
 - ECC recommends removing this statement
 - Since gas sampling is not required in the protocol, this appears to be an error.
- Section 6.6.1: The sampling ports must be located opposite each other (i.e. both ports cannot be at the same end of the container)
 - ECC believes that this section intended to address mixing ports rather than sampling ports. There is no requirement for a gas sampling port, nor reason for specifying its location. If the intent in this sentence was to specify that the mixing ports were located opposite/across/not near each other, ECC agrees that the mixing ports should not be in the same section or location on the tank- they should be on opposite sides/ends of the tank (i.e. top and bottom or left and right)



- Section 6.6.1: “Alternatively, circulation may occur at a rate that is less than 30 gallons/minute, as long as the ODS is circulated continuously for a minimum of 8 hours”
 - ECC proposes that circulation of a volume equal to two times the container contents should occur either 1. At a rate of no less than 30 gpm; or 2. In 4 hours or less.
 - ECC suggests that there is a danger in providing no lower limit or requirement to the speed of circulation.
 - Mandating a time in which the mixing of the required volume must occur allows for a wide variety of container sizes, volumes, and valves, while still placing a lower threshold on the mixing rate which will help ensure complete mixing.
 - The following example container volumes illustrate the proposal:

½ ton Cylinder (119 Gallons)	Mix total = 238 gallons	Min. Mix Rate = .99 GPM
3000 Gallon Trailer	Mix Total = 6000 Gallon	Min. Mix Rate = 25 GPM
5000 Gallon ISO	Mix Total = 10000 Gallons	Min. Mix Rate = 42 GPM

Thank you very much for the opportunity to comment on this Protocol. We would be pleased to discuss any of the proposals in this Public Comment with you. Please feel free to contact Derek Six at dsix@envcc.com.

Sincerely,

Derek Six
Portfolio Manager