

# **SAFE DISPOSAL SYSTEMS, INC.**

4301 NORTH DELAWARE AVE BLDG A  
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PHONE: 215-268-7500 FAX: 215-268-7499



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:

Safe Disposal Systems has completed multiple registrations in conjunction with Environmental Credit Corp. We appreciate the opportunity to comment on the Protocol changes.

- *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”*
  - We believe it would be very difficult if not impossible to determine the manufacturer’s intentions. The verification process would reveal if the ODS was sourced from a process that was using it as a solvent.
- **Section 5.3: Deduction for Vapor Composition Risk**
  - SDS feels the vapor composition risk is small and exists only in special circumstances that would be better addressed in a different manner.
  - The Worst Case Scenario from the presentation is alarmist. R23 has a vapor pressure in excess of 600 PSI at 70 degrees F. Presenting R113 and R23 in the same vessel at the volumes shown would be extremely difficult.
  - The current language has inadequate limits and thresholds.
    - Some examples:
      - 99.99% R11 with .01% R22 would receive a 5% deduction
      - 99.99% R113 with .01% R134a would receive a 5% deduction.
      - 97.90% R11 with 1.0% R12 and 1.1% R134a would receive a 5% deduction.
      - .99 % R11 with 50% R12 and 49.01% R22 would NOT receive a 5% deduction.

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- 1.00 % R11 with 50% R22 and 49.01% R12 would receive a 5% deduction.
- The scenarios described in the presentation have very little risk until the vessel is mostly empty or the ineligible gas is extremely high.
- SDS suggests that mixtures and combinations of gas that pose the highest risks be singled out. It seems unfair to project developers to receive a substantial deduction for mixtures that have low risk of over crediting.
- SDS suggests the deletion of this section.
- Sections 6.4 and 6.6: Requiring that scales are within 1% accuracy
  - There are 46 States that require NTEP Certificate of Conformance for trade weights and devices in service. These “Legal for Trade” requirements are well established and more restrictive than the protocol. We suggest the protocol adopt the same requirements the local supermarket to the local scrap yard must follow when it comes scale certifications. The current limit of 1% is excessive especially considering the spotlight on over crediting vapor composition risks.
  - Since destruction facilities are billing by weight they are already subject to this requirement.
- Section 6.6: “The Technician must ensure that all valves between the container and the sample port are open”
  - SDS 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”
  - SDS recommends removing this statement
  - Since vapor 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)
  - SDS believes there is no language change necessary. If the mixture is “mixed” the location the sample is taken is irrelevant.
- 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”

Suggested language.

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3. Circulation must occur within 4 hours if the circulation rate is below 30 gallons/minute.

This creates a variable mixing rate for smaller containers; owners can size the pump in relation to the valves on the tank and still effectively mix the contents.

Example:

$\frac{1}{2}$  ton Cylinder = 119 Gallons containing 80% material = 95.2 gallons x 2 = 190.4 gallons  
190.4 gallons/ 4 hours = 47.6 gallons/hour or .793 gallons per minute.

Sincerely,

A handwritten signature in cursive script, appearing to read "Brian Connors".

Brian Connors  
President