



# **U.S. Ozone Depleting Substances Project Protocol Version 1.0 ERRATA AND CLARIFICATIONS**

The Climate Action Reserve (Reserve) published its U.S. Ozone Depleting Substances Project Protocol Version 1.0 (U.S. ODS V1.0) in February 2010. While the Reserve intends for the U.S. ODS V1.0 to be a complete, transparent document, it recognizes that correction of errors and clarifications will be necessary as the protocol is implemented and issues are identified. This document is an official record of all errata and clarifications applicable to the U.S. ODS V1.0.<sup>1</sup>

Per the Reserve's Program Manual, both errata and clarifications are considered effective on the date they are first posted on the Reserve website. The effective date of each erratum or clarification is clearly designated below. All listed and registered U.S. ODS projects must incorporate and adhere to these errata and clarifications when they undergo verification. The Reserve will incorporate both errata and clarifications into future versions of the U.S. ODS Project Protocol.

All project developers and verification bodies must refer to this document to ensure that the most current guidance is adhered to in project design and verification. Verification bodies shall refer to this document immediately prior to uploading any Verification Statement to assure all issues are properly addressed and incorporated into verification activities.

If you have any questions about the updates or clarifications in this document, please contact Policy at [policy@climateactionreserve.org](mailto:policy@climateactionreserve.org) or (213) 891-1444 x3.

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<sup>1</sup> See Section 4.3.4 of the Climate Action Reserve Program Manual for an explanation of the Reserve's policies on protocol errata and clarifications. "Errata" are issued to correct typographical errors. "Clarifications" are issued to ensure consistent interpretation and application of the protocol. For document management and program implementation purposes, both errata and clarifications to the U.S. ODS protocol are contained in this single document.

*Please ensure that you are using the latest version of this document*

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## Section 2

### 1. Eligibility of Solvents and Other ODS Applications (CLARIFICATION – May 7, 2010)

**Section:** 2.3 (Eligible ODS)

**Context:** The U.S. ODS V1.0 identifies two classes of ODS that are eligible for crediting: refrigerant and foam blowing agents. However, the protocol does not explicitly address solvents, medical aerosols, or other applications for ODS. The protocol does, however, explicitly provide eligibility to refrigerants and foam blowing agents. The intention of the protocol is to exclude all sources not explicitly included.

**Clarification:** ODS that were produced for, used as, or intended for use as solvents, medical aerosols, or other ODS applications are not eligible under the U.S. ODS V1.0.

### 2. Attestation of Title and Commencement of Verification Activities (CLARIFICATION – December 15, 2011)

**Section:** 2.4 (The Project Developer)

**Context:** Section 2.4 specifies that the project developer must attest to clear ownership of the project's GHG reductions prior to commencement of verification activities by signing the Reserve's Attestation of Title form. It is unclear if this language means that all verification activities must wait until after Attestation of Title is signed, or if only verification activities related to confirming the Attestation of Title must wait.

**Clarification:** Verification activities related to confirming the Attestation of Title must wait until the project developer has signed and uploaded the form to the Reserve.

Other verification activities (such as site visits or project material eligibility confirmation) may commence at any time after the project is listed if the verification body has appropriately submitted the NOVA/COI form and received approval from the Reserve that the verification can move forward.

## Section 3

### 3. Execution of Attestation of Title (ERRATUM – May 7, 2010)

**Section:** 3.2 (Project Start Date)

**Context:** Footnote 15 on page 9 states that "Projects are considered submitted when the project developer has fully completed and filed the appropriate Submittal Form and Attestation of Title, available on the Reserve's website." With the issuance of the Climate Action Reserve Program Manual, March 2010, the Attestation of Title document is now required at the time of project verification rather than the time of project submittal. Section 2.4 correctly characterizes this timing: "Ownership of the GHG reductions must be established by clear and explicit title, and the project developer must attest to such ownership prior to commencement of verification activities each time the project is verified by signing the Reserve's Attestation of Title form."

**Correction:** Projects are considered submitted when the project developer has fully completed and filed the appropriate Submittal Form, available on the Reserve's website.

#### 4. Attestation of Voluntary Implementation and Commencement of Verification Activities (CLARIFICATION – December 15, 2011)

**Section:** 3.4.1 (The Legal Requirement Test)

**Context:** Section 3.4.1 specifies that the project developer must attest that the project is not legally required by submitting a signed Attestation of Voluntary Implementation form prior to commencement of verification activities. It is unclear if this language means that all verification activities must wait until after the Attestation of Voluntary Implementation is signed, or if only verification activities related to confirming the Attestation of Voluntary Implementation must wait.

**Clarification:** Verification activities related to confirming the Attestation of Voluntary Implementation must wait until the project developer has signed and uploaded the form to the Reserve.

Other verification activities (such as site visits or project material eligibility confirmation) may commence at any time after the project is listed if the verification body has appropriately submitted the NOVA/COI form and received approval from the Reserve that the verification can move forward.

#### 5. Attestation of Regulatory Compliance and Commencement of Verification Activities (CLARIFICATION – December 15, 2011)

**Section:** 3.5 (Regulatory Compliance)

**Context:** Section 3.5 specifies that the project developer must attest that the project is in material compliance with all applicable laws by submitting a signed Attestation of Regulatory Compliance form prior to commencement of verification activities. It is unclear if this language means that all verification activities must wait until after the Attestation of Regulatory Compliance is signed, or if only verification activities related to confirming the Attestation of Regulatory Compliance must wait.

**Clarification:** Verification activities related to confirming the Attestation of Regulatory Compliance must wait until the project developer has signed and uploaded the form to the Reserve.

Other verification activities (such as site visits or project material eligibility confirmation) may commence at any time after the project is listed if the verification body has appropriately submitted the NOVA/COI form and received approval from the Reserve that the verification can move forward.

### Section 4

#### 6. Figure 4.1, SSR 6 (ERRATUM – May 7, 2010)

**Section:** 4 (GHG Assessment Boundary)

**Context:** The box for SSR 6: Refrigeration in Figure 4.1 on page 12 is white, indicating that it is only applicable to the baseline. Table 4.1 identifies SSR 6 as applicable to both baseline and project scenarios. Table 4.1 is correct, and the box in Figure 4.1 was erroneously left white.

**Correction:** SSR 6 in Figure 4.1 shall be considered applicable to baseline and project, and shaded grey.

## Section 5

### 7. Accounting for ODS Purity (CLARIFICATION – November 3, 2011)

**Section:** 5.1.1 (Calculating Baseline Emissions from Refrigerant Recovery and Resale)

**Context:** The term “ $Q_{\text{refr},i}$ ” in Equation 5.3 on page 21 is defined as “Total quantity of refrigerant ODS  $i$  sent for destruction by the project.” The intent is that this term shall only include the weight of pure ODS for each species. This intent may not be clear in regards to projects that are destroying concentrated, non-mixed ODS (defined as greater than 90% composition of a single ODS species).

**Clarification:** The definition of the term “ $Q_{\text{refr},i}$ ” in Equation 5.3 on page 21 shall read “Total quantity of pure refrigerant ODS  $i$  sent for destruction by the project.” In any case where the composition of the single ODS species is less than 100%, the value of this term must be adjusted to reflect the weight of pure ODS.

### 8. Accounting for Non-ODS Material (CLARIFICATION – January 29, 2013)

**Section:** 5.1.1 (Calculating Baseline Emissions from Refrigerant Recovery and Resale)

**Context:** Clarification 7 above (issued on November 3, 2011) states that projects shall only include the weight of pure ODS when calculating emission reductions. There are additional specific adjustments that were not mentioned in the previous clarification and it may not be clear how these adjustments should be made. Specifically, project developers shall exclude the weight of high boiling residue (HBR) in their calculation of emission reductions.

**Clarification:** The definition of the term “ $Q_{\text{refr},i}$ ” in Equation 5.3 on page 21 shall read “Total quantity of pure refrigerant ODS  $i$  sent for destruction by the project.” The total weight of material destroyed by the project shall be adjusted to exclude the weight of ineligible material, including high boiling residue, as determined by the laboratory analysis required in Section 6.6 (in the case of multiple laboratory analyses, the highest reported value for HBR shall be used). In any case where the composition of the single ODS species is less than 100%, the value of this term must also be adjusted to reflect the weight of pure ODS for each eligible chemical.

For example, if a project destroys 1,000 lbs. of material that contains 5% high boiling residue and 95% eligible ODS  $i$ , the value of  $Q_{\text{refr},i}$  would be 902.5 lbs.

While water is also considered ineligible material, the moisture content requirement in Section 6.6 of the protocol (i.e. that the moisture content must be less than 75% of the saturation point for the ODS) already ensures that the weight of any moisture present will

not have a material impact on the quantification of emission reductions. Thus the weight does not need to be adjusted to reflect the weight of moisture present in the sample.

## 9. Accounting for Ineligible ODS After Destruction (CLARIFICATION – November 3, 2011)

**Section:** 5.1.1 (Calculating Baseline Emissions from Refrigerant Recovery and Resale)

**Context:** Verification of a reporting period often begins after the destruction of the ODS is completed. If, during verification, the verification body cannot confirm that a portion of the ODS that was sent for destruction was eligible, this portion of the material shall be considered ineligible. The protocol is not clear, however, whether the project developer may still claim emission reductions for any remaining ODS whose eligibility was able to be confirmed. Clarification is needed to indicate that the project developer may perform a back-out calculation to exclude the ineligible ODS from the calculation of baseline emissions for the project.

**Clarification:** Ineligible ODS shall be excluded from baseline emission calculations. For projects that are destroying refrigerant ODS, the following subtraction shall be made to the value of  $Q_{\text{refr},i}$  to be used in Equation 5.3. For projects that are destroying ODS from foam blowing agent, the following subtraction shall be made to the value of  $BA_{\text{app},i}$  or  $BA_{\text{build},i}$  depending on the source, to be used in Equation 5.4. The adjustment is not to be applied to project emission calculations (i.e., any variables in Section 5.2). The weight of ODS to be subtracted from quantification of baseline emissions shall be determined by:

### *Option A: Confirmed weight and composition*

If the project developer can produce data that, based on the verifier's professional judgment, confirm the weight and composition for the specific ODS that is deemed to be ineligible (or whose eligibility cannot be confirmed), these data shall be used to adjust the appropriate equation value. Specifically, the project developer shall subtract the weight of the ineligible ODS species from  $Q_{\text{refr},i}$ ,  $BA_{\text{app},i}$  or  $BA_{\text{build},i}$ , as appropriate, prior to calculating the baseline emissions in order to account only for the destroyed ODS that was confirmed to be eligible by the verification body.

### *Option B: Default values*

If sufficient data are not available to satisfy the Option A requirements, then the most conservative estimate of the weight and composition of ineligible ODS shall be used. Specifically, the composition shall be assumed to be 100% of the ODS species with the highest GWP based on the composition analysis, and the relevant container shall be assumed to have been full. If the project developer has only some of the data required for Option A (i.e., weight or composition, but not both), this may be used in place of the conservative assumptions above, as long as the data can be confirmed by the verification body.

## 10. Equation 5.4 (ERRATUM – May 7, 2010)

**Section:** 5.1.2 (Calculating Baseline Emissions from Shredding and/or Landfilling ODS Foam Blowing Agents)

**Context:** Equation 5.4 on page 22 is used to calculate baseline emissions from ODS blowing agents. The third part of the equation calculates the blowing agent from building foam that is sent for destruction. The equation contains a typographical error and states

$BA_{\text{build}} = Q_{\text{foam}} + BA\%$  instead of the intended  $BA_{\text{build}} = Q_{\text{foam}} \times BA\%$ . This typographical error results in an incorrect calculation and disagreement of units that render it unusable as presented.

**Correction:** The “+” in the third sub-equation in Equation 5.4 shall be changed to “x”.

## 11. Time Horizon of Foam Blowing Agent Baseline Emissions (ERRATUM – May 7, 2010)

**Section:** 5.1.2 (Calculating Baseline Emissions from Shredding and/or Landfilling ODS Foam Blowing Agents)

**Context:** The first sentence on page 23 states “The total percent of ODS foam blowing agent that would be released throughout the end-of-life processing (i.e. *lifetime* emission rates) for each ODS foam blowing agent and foam origin is presented in Table 5.3” (emphasis added). The term “lifetime” also appears in the title and column headers for Table 5.3. The U.S. ODS V1.0 uses a 10-year crediting period over which to estimate project emission reductions. This is a typographical error, but has no substantive impact on the protocol’s meaning or results.

**Correction:** The word “lifetime” in the above referenced sentence and throughout Table 5.3 shall be changed to “10-year.”

## 12. Equation 5.5 (ERRATUM – May 7, 2010)

**Section:** 5.2 (Quantifying Project Emissions)

**Context:** The term “Tr” in Equation 5.5 on page 25 is defined as “Total emissions from transportation of ODS (calculated using either the default value in or Equation 5.14).” A reference to Equation 5.8 was accidentally omitted.

**Correction:** The term “Tr” in Equation 5.5 shall be defined as “Total emissions from transportation of ODS (calculated using either the default value in Equation 5.8 or Equation 5.14).”

## 13. Calculation of Transportation Emissions (CLARIFICATION – November 3, 2011)

**Section:** 5.2 (Quantifying Project Emissions)

**Context:** The term “TMT<sub>i</sub>” in Equation 14 on page 30 specifies that transportation emissions should include the weight of not only the eligible ODS, but also “any accompanying material and containers from point of aggregation to destruction.” The term “Q<sub>ODS,i</sub>” in Equation 5.8 on page 27, however, does not include a similar specification. The intent is that this term shall include the weight of all ODS included in the shipment, and should not be limited only to the weight of eligible ODS.

**Clarification:** The term “Q<sub>ODS,i</sub>” in Equation 5.8 shall be defined as “Total quantity of ODS *i* sent for destruction in the project, including eligible and ineligible material.”

## 14. Frequency of Recovery Efficiency Calculation (CLARIFICATION – May 7, 2010)

**Section:** 5.2.2 (Calculating Project Emissions from ODS Blowing Agent Extracted from Appliance Foam); Table 6.2 (ODS Project Monitoring Parameters); Appendix E (Foam Recovery Efficiency and Calculations)

**Context:** Language in Section 5.2.2 states that “The recovery efficiency must be calculated periodically...”. Table 6.2 states that the measurement frequency for the parameter “RE” is “Once.” Appendix E states that “All appliance foam projects must calculate a recovery efficiency based on a run of a minimum ten appliances.” The ambiguity among these statements has led to confusion as to whether the recovery efficiency must be established once per facility, and thereby applicable to all projects using that facility, or once per project. The intent of the protocol is to require that recovery efficiency be established once per project.

**Clarification:** Recovery efficiency must be independently established once for each individual project. The entry for measurement frequency associated with the parameter “RE” in Table 6.2 shall be changed to “For each project.”

## 15. Performance Requirements for Destruction Facilities (ERRATUM – July 16, 2015)

**Section:** 5.2.4 (Calculating Site-Specific Project Emissions from ODS Destruction)

**Context:** The protocol states that destruction “facilities are required to demonstrate their ability to achieve destruction efficiencies upwards of 99.99% for substances with thermal stability ratings *higher* than the ODS included under this protocol” (emphasis added). The reference cited for this statement explains a ranking system for the incinerability of ODS species based on their thermal stability. In this system, ODS species that are more thermally stable are more difficult to destroy. This results in a *lower* ranking. Thus, the lowest ranking (1) indicates the chemical that is most difficult to destroy, while the highest ranking (320) indicates the chemical that is easiest to destroy. The above-quoted statement in the U.S. ODS Project Protocol includes an error that communicates the opposite of the intended meaning of the statement.

**Correction:** The second sentence in the first paragraph of this section shall read:

“These facilities are required to demonstrate their ability to achieve destruction efficiencies upwards of 99.99% for substances with thermal stability rankings lower than the ODS included under this protocol.”

## Section 6

### 16. ODS Tracking System Requirements and Commencement of Verification Activities (CLARIFICATION – December 15, 2011)

**Section:** 6.1 (Reserve ODS Tracking System)

**Context:** Section 6.1 specifies that information from the project’s Certificate(s) of Destruction must be entered into the Reserve ODS Tracking System “prior to the beginning



of verification activities to confirm that reductions have not been claimed by other parties for the destruction activity in question.” It is unclear if this language means that all verification activities must wait until after the required information is entered into the ODS Tracking System, or if only verification activities related to confirming that reductions have not been claimed by other parties must wait.

**Clarification:** Verification activities related to confirming that project reductions have not been claimed by other parties must wait until the project developer has entered the required information into the ODS Tracking System.

Other verification activities (such as site visits) may commence at any time after the project is listed if the verification body has appropriately submitted the NOVA/COI form and received approval from the Reserve that the verification can move forward.

## 17. Demonstration of Stockpile Status (CLARIFICATION – May 7, 2010)

**Section:** 6.2 (Point of Origin Documentation Requirements)

**Context:** Table 6.1 in section 6.2 of the protocol defines the point of origin as the location of the stockpile for “Refrigerant ODS stockpiled for greater than 24 months; or stockpiled prior to the adoption date of this protocol and destroyed within twelve months of the adoption date of this protocol.” In order to operate under this point of origin definition, a project must demonstrate that the destroyed ODS was stockpiled on or before a certain date. Where the stockpile is in the form of sealed containers, this date can be easily demonstrated. However, in some instances, ODS will be stockpiled in large reservoirs that may be continuously filled and drawn off of. In these instances, there is no date of closure for the container, and establishing the date on which the destroyed quantity of ODS was first stockpiled is more difficult.

**Clarification:** For destroyed ODS where the point of origin is a reservoir-style stockpile (i.e., it was not sealed), the date on which the ODS was stockpiled is established using “first-in/first-out” accounting. Specifically, the date on which a quantity of ODS was “stockpiled” is defined as the furthest date in the past on which the quantity of ODS contained in the reservoir was greater than or equal to the total quantity of all ODS removed from the reservoir since that date (including any ODS removed and destroyed as part of the project). The date must be established using management systems and logs that verify the quantities of ODS placed into and removed from the reservoir throughout the relevant period.

Provided these elements are met, and the stockpile follows the “first-in/first-out” accounting, the date on which a quantity of ODS was stockpiled may be established.

## 18. Point of Origin Documentation Requirements (CLARIFICATION – November 3, 2011)

**Section:** 6.2 (Point of Origin Documentation Requirements)

**Context:** Table 6.1 in Section 6.2 provides guidance for determining the point of origin for quantities of ODS. Footnote b describes how the point of origin is defined for ODS that was collected in quantities smaller than 500 lbs. and then combined to a volume greater than

500 lbs. It is unclear what level of detail the verification body must achieve when evaluating the eligibility of ODS in containers greater than 500 lbs.

**Clarification:** The following text shall be inserted below Table 6.1 as a new paragraph:

“Project developers must be able to document the point of origin for all ODS that will be included in the project as defined above. For containers of ODS greater than 500 lbs. (determined as the weight of eligible ODS within a single container), the project developer must provide documentation as to the origin of the ODS within that container. If it is shown that, prior to aggregation in the project container, the ODS was contained as a quantity greater than 500 lbs., then the documentation must extend back to this previous container and its point of origin. The project developer must provide documentation tracking the ODS back to a point where it was either a) contained as a quantity of less than 500 lbs., or b) collected by a service technician as a quantity of greater than 500 lbs.”

## 19. Ownership of CRTs (CLARIFICATION – May 7, 2010)

**Section:** 6.3 (Custody and Ownership Documentation Requirements)

**Context:** In discussing custody and ownership of ODS, Section 6.3 states that “The verifier will review these records and will perform other tests necessary to authenticate the previous owners of the material, the physical transfer of the product, and the **title transfer of ownership** to the project developer” (emphasis added). While the ownership and physical transfer of the ODS material must be fully documented, it was not the Reserve’s intention to require that the project developer own the ODS material in full. Rather, the project developer must possess beneficial ownership rights to the GHG attributes and emission reductions associated with the destruction of that ODS.

**Clarification:** The project developer must own the beneficial ownership rights, as defined in the Attestation of Title, to all emissions and emission reductions associated with destroyed ODS, as documented by a contract, agreement, or other legal document.

## 20. Foam Gas Sampling Requirements (ERRATUM – May 7, 2010)

**Section:** 6.4 (Building Foam Requirements)

**Context:** The third sub-bullet to the fourth bullet under paragraph “3” on page 33 reads “When cooled to room temperature, gas samples must be redrawn from the headspace by gas chromatograph.”

**Correction:** The third sub-bullet to the fourth bullet under paragraph “3” on page 33 shall be changed to: “When cooled to room temperature, gas samples must be redrawn from the headspace and analyzed by gas chromatograph.”

## 21. Scale Calibration (CLARIFICATION – May 7, 2010)

**Section:** 6.6 (Concentrated ODS Composition and Quantity Analysis Requirements)

**Context:** Numbered item 2 in Section 6.6 states that “The scale used must be properly calibrated per the facility’s RCRA permit, or for non-RCRA facilities calibrated at least quarterly to an accuracy of within 5% of reading.” RCRA facilities may not have a calibration requirement contained in their RCRA permits. If this is the case, these facilities must calibrate quarterly.

**Clarification:** RCRA facilities that do not have calibration requirements defined in their RCRA permits shall calibrate scales quarterly to an accuracy of within 5% of reading.

## 22. Determining the Mass of ODS Destroyed (CLARIFICATION – April 11, 2013)

**Section:** 6.6 (Concentrated ODS Composition and Quantity Analysis Requirements)

**Context:** The protocol requires that the mass of ODS destroyed by the project be determined using (1) the difference between the measured weight of each container when it is full prior to destruction and the measured weight after it has been emptied and (2) the composition and concentration of material destroyed as determined by laboratory analyses of samples from each container.

**Clarification:** The mass of ODS and any contaminants destroyed shall be considered equal to the difference between the full and empty weights of the containers, as measured by the scale at the destruction facility and recorded by the destruction facility on the weight tickets and the Certificate of Destruction. No adjustments shall be made by the project developer to the weights as measured and recorded by the destruction facility in calculating the mass of ODS and contaminants.

Verifiers shall confirm that the weights recorded on the weight tickets and the Certificate of Destruction by the destruction facility are used without adjustment to calculate emission reductions. The mass of eligible ODS shall then be determined using these weights and the results of the laboratory analyses.

## 23. Calculation of Moisture Content (CLARIFICATION – November 7, 2011)

**Section:** 6.6 (Concentrated ODS Composition and Quantity Analysis Requirements)

**Context:** The third numbered list in Section 6.6 (page 35) stipulates that the “moisture content of each sample must be less than 75% of the saturation point for the ODS...” This requirement is also referenced in Section 6.6.1 regarding mixed ODS, but it is not clear how this requirement is to be interpreted and applied for the analysis of mixed ODS.

**Clarification:** The following text shall be added to the end of item 3 in the third numbered list: “For containers that hold mixed ODS (as defined below), the sample’s saturation point shall be assumed to be that of the ODS species in the mixture with the lowest saturation point that is at least 10% of the mixture by mass. If the sample is tested to have a moisture content greater than 75%, the project developer shall de-water the ODS mixture before repeating the sampling and analysis procedures.”

It should be noted that project developers have the option of measuring moisture content and carrying out any necessary de-watering prior to the required sampling and laboratory analysis.

## 24. ODS Mixing Rate (CLARIFICATION – November 3, 2011)

**Section:** 6.6.1 (Analysis of Mixed ODS)

**Context:** This section requires that ODS mixing must result in circulating a “volume of the mixture equal to two times the volume in the container” and that the “[c]irculation must occur at a rate of at least 30 gallons/minute.” In practice, this requirement limits the choice of equipment used for mixing. The intent of this section is to provide minimum requirements to ensure that enough mixing has occurred for the ODS mixture to reach an equilibrium state within the container, not to specify a particular size or type of equipment.

**Clarification:** To allow flexibility in the equipment used for mixing, the following text shall be added to the end of item 3 in the list at the top of page 37: “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.”

## Section 7

### 25. Required Project Documentation (CLARIFICATION – November 3, 2011)

**Section:** 7.1 (Project Documentation)

**Context:** While project developers must upload information from the project’s certificate(s) of destruction (COD) into the Reserve’s ODS Tracking System (Section 6.1), they have not been required to submit or upload the COD itself to the Reserve. Additionally, while Section 6.6 requires that the project developer obtain an analysis of the composition of the ODS by an AHRI certified laboratory, the results of such analysis have not been submitted to the Reserve.

**Clarification:** For record keeping purposes, project developers shall upload project CODs and ODS composition analyses through the Reserve software for each reporting period prior to each verification. The following items shall be included in both bulleted lists found in Section 7.1 on page 42:

- Certificate(s) of Destruction
- Laboratory analysis of ODS composition

### 26. Joint Verification (CLARIFICATION – May 7, 2010)

**Section:** 7.2 (Joint Verification); 8.1 (Joint Project Verification)

**Context:** U.S. ODS V1.0 allows for the joint verification of concurrent projects in instances where the project developer and the verification body are the same. However, the language is not explicit as to whether the projects must have identical reporting periods, or what the conditions are that allow joint verification to take place. The intent of the joint verification provision is to lessen administrative costs and verification redundancy where common facilities or documentation are used for separate projects.

**Clarification:** Two or more projects may be jointly verified only if:

- the project developer has contracted with a single verification body for all projects involved
- all projects involved have an approved NOVA/COI form with designated site visit dates prior to the commencement of joint verification activities

- an appropriate verification plan covering all aspects of the individual projects involved has been prepared prior to any shared site visits or verification activities
- project activities associated with all involved projects have commenced prior to the shared site visit or verification activity. In some instances, this may be prior the project start date (e.g., the collection activities have begun but destruction has not commenced)

Provided these elements are met, the verifier may, at his or her discretion, conduct a joint verification of two or more projects.

## Section 8

### 27. Confirmation of ODS Identity (CLARIFICATION – November 3, 2011)

**Section:** 8.7.2 (Conformance with Operational Requirements and ODS Eligibility)

**Context:** During verification, the verification body examines point of origin records for the ODS to be destroyed, as well as the lab analysis of the ODS that was sampled at the destruction facility. It is implied, but not explicitly stated, that the verification body is to compare these data sources to confirm that the ODS documented at the point of origin is the same ODS that was destroyed.

**Clarification:** The verification body shall compare the point of origin documentation with the weight and composition documentation of the ODS that is received at the destruction facility. Professional judgment and risk analysis are to be employed in determining whether a small variation between these data sources constitutes a significant difference. The following row shall be added to Table 8.4 on page 49:

Protocol Section	Operational Requirement and ODS Eligibility Items	Apply Professional Judgment?
6.2, 6.6	For all ODS, verify that the point of origin documentation agrees with the data reported at the destruction facility (weight and composition) with no significant discrepancies	Yes