



## OFFICE OF AIR AND RADIATION

WASHINGTON, D.C. 20460

September 23, 2025

TRANSMITTED VIA EMAIL  
RETURN RECEIPT REQUESTED

Ms. Mary Grady  
President and CEO of ERT and ACR Executive Director  
ACR c/o Winrock International  
325 W Capitol, Suite 350  
Little Rock, Arkansas 72201

Dear Ms. Grady,

In light of concerns about the continuing need for halons, especially Halon-1301, for use as a fire suppression agent, particularly in aviation and other enduring uses, the U.S. Environmental Protection Agency (EPA) is evaluating the destruction of halons that can be reprocessed, including destruction under carbon credit and offset programs. Pursuant to Clean Air Act (CAA) Section 114(a), 42 U.S.C. § 7414(a), the EPA is requiring ACR (“ACR,” “the company,” or “you”) to submit information.

Halons are class I ozone-depleting substances regulated under CAA Title VI. EPA regulations at 40 C.F.R. Part 82, Subparts A, G, and H establish requirements for the production, import, export, destruction, and use of halons.

Section 114(a) authorizes the Administrator of the EPA to require any person whom the Administrator believes may have information necessary for the purposes set forth in Section 114(a), or who is subject to any requirement of the CAA, to provide such information as the Administrator may reasonably require for the purpose of carrying out any provision of the CAA. Therefore, in accordance with Section 114(a)(1), providing this information is mandatory.

Within 21 days of receipt of this information request letter, ACR must provide the information requested in the enclosure to this letter. Please provide responses in electronic format through the EPA’s Central Data Exchange (CDX). Instructions on how to submit the information securely through CDX can be found here: <https://www.epa.gov/ods-phaseout/submitting-other-documents-epa>.

ACR must submit all required information accompanied by the following certification, signed and dated by a responsible official of ACR:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1519.

Be aware that if ACR does not provide the information requested in a timely manner, the EPA may order you to comply and may assess monetary penalties under Section 113 of the CAA, 42 U.S.C. § 7413. Federal law establishes criminal penalties for providing false information to the EPA. This letter is not subject to Office of Management and Budget review pursuant to the Paperwork Reduction Act, 44 U.S.C. Chapter 35.

You may assert a business confidentiality claim covering part or all of the information requested in the manner described by 40 C.F.R. § 2.203(b). Information covered by such a claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in 40 C.F.R. Part 2, Subpart B. Note that certain categories of information, such as emission data, are not properly the subject of such a claim. If no such claim accompanies the information when the EPA receives it, the EPA may make the information available to the public without further notice to you.

Please contact Cindy Newberg of the Stratospheric Protection Division at [Newberg.Cindy@epa.gov](mailto:Newberg.Cindy@epa.gov) or (202) 343-9729 if you have any questions regarding this letter.

Sincerely,



Aaron Szabo  
Assistant Administrator

Enclosure: Information to Send to EPA

cc: Ms. Jessica Bede  
Managing Director

## Enclosure

### Information to Send to EPA

Provide the following information to the EPA, printed in English. Such information shall pertain to ACR's efforts associated with Halon-1211 (CF<sub>2</sub>BrCl) and Halon-1301 (CF<sub>3</sub>Br) destruction projects.

1. For halon destruction under "Methodology for the Quantification, Monitoring, Reporting and Verification of Greenhouse Gas Emissions Reductions and Removals from the Destruction of Ozone Depleting Substances and High-GWP Foam," version 2.0 (February 2023) ("the methodology"),
  - a. Provide a summary of the requirements and process applicable for Halon-1211 and Halon-1301 to earn carbon credits under the methodology. The summary should at minimum include what activity needs to be performed to earn carbon credits (e.g., destruction), eligibility criteria (e.g., sourcing limitations, technology performance standards), key assumptions within the methodology to determine the number of credits that can be earned, and other key points.
  - b. What is the definition of the term "strategic stockpile" as described in the methodology? Explain how to determine whether Halon-1211 and Halon-1301 are contained within a "strategic stockpile."
  - c. Explain how ACR determined it was appropriate to allow for foreign destruction of U.S.- and Canadian-sourced halons.
  - d. ACR has previously noted a concern that availability of carbon offset credits would incentivize premature destruction of strategic stockpiles of halons. Explain how destruction under this methodology will not decrease availability of Halon-1211 and Halon-1301 for critical applications, such as aviation.<sup>1</sup>
  - e. Explain how ACR came to the conclusion that "[d]estruction of the halons will not trigger any additional halon production because of the complete phaseout of halons worldwide," (Section D.4.2).<sup>2</sup>
2. Is the methodology under review or is there a revision underway or scheduled in the next few years?
3. How does the methodology for destruction of halons differ between the original and subsequent versions? What were the reasons for the changes?
4. For halon destruction projects that have been issued carbon credits under the methodology,

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<sup>1</sup> For reference, see the interest within the aviation industry for an essential use nomination for new production of Halon 1301 described in chapter 3 of the Montreal Protocol's Technology and Economic Assessment Panel May 2025: Progress Report (Volume 1) available at <https://ozone.unep.org/system/files/documents/TEAP-May2025-Progress-Report-vol1.pdf>. Also see the International Civil Aviation Organization (ICAO) Working Paper, A42-WP/74, TE/20: The Challenge of Halon Replacement: Balancing Fire Safety, Environmental Goals, and Industry Readiness (25/07/2025) available at: [https://www.icao.int/sites/default/files/Meetings/a42/Documents/WP/wp\\_074\\_en.pdf](https://www.icao.int/sites/default/files/Meetings/a42/Documents/WP/wp_074_en.pdf).

<sup>2</sup> For context, some carbon offset programs have determined that halons are not eligible for credits, e.g., California's and Washington's. Washington State noted that halon destruction could rise to levels that require a regulatory response to ensure halon production exemptions so critical use is not disrupted. See: [https://www.ezview.wa.gov/Portals/\\_1962/images/Cap-and-Invest/ODS%20Considered%20Revisions%20-%20Sept.%202024.pdf](https://www.ezview.wa.gov/Portals/_1962/images/Cap-and-Invest/ODS%20Considered%20Revisions%20-%20Sept.%202024.pdf).

provide the following information on each project that has been submitted:

- a. Project ID
  - b. Project summary
  - c. Project developer
  - d. Project name
  - e. Project type
  - f. Date the project was accepted and/or approved for credits (if applicable)
  - g. Date the project was rejected (if applicable)
  - h. Types and quantities of halons destroyed
  - i. Source(s) of the halons and supporting documentation
  - j. Results from testing and verification of the material quality and composition (i.e., purity)
  - k. Location and name of the facility where the halons were destroyed
  - l. Date of destruction
  - m. Technology used or planned to be used to destroy the halons
  - n. Entity validating and/or verifying the project
  - o. Total number of credits requested
  - p. Total number of credits issued (if applicable)
  - q. All documents submitted by the project developer and entity validating/verifying the project
  - r. Contact information for all the organizations involved in some aspect of the project
  - s. Description of the steps taken to verify/validate all required elements of the project, including but not limited to:
    - i) Compliance with all of the relevant requirements in Section 2.1 of the methodology, including all applicable monitoring and operational requirements as well as all other applicable federal, state, provincial, and local laws that apply directly to ODS (e.g., Regulation (EU) 2024/590 prohibiting the destruction of halons unless the purity of the substance does not allow for its reclamation and subsequent re-use (see Article 20(4): [EU ODS regulation](#)), if destroyed in the European Union)
    - ii) Consistency of the sourcing of halons with Section 2.2.4 of the methodology, including that all halons originated from equipment or systems in the United States and Canada and that the halons were not in a strategic stockpile
5. Is ACR aware of any halon destruction projects that are underway or in the process of being submitted for carbon credits? If so, please provide a summary of what ACR knows about the project(s) (e.g., project developer, type(s) of halons, quantities, source(s), timeframe for activities, location and name of facility where the halons are intended to be destroyed).
6. Is ACR aware of any other registries or methodologies that provide carbon credits for halon destruction? If yes, provide a list of the organizations and relevant methodologies.

Include any claims of business confidentiality and reasons for requesting confidential treatment of the information. Mark information claimed as confidential with square brackets. Provide a public version of the information that redacts information you claim as confidential.