



OFFICE OF AIR AND RADIATION

WASHINGTON, D.C. 20460

September 23, 2025

TRANSMITTED VIA EMAIL
RETURN RECEIPT REQUESTED

Mr. John Demeter
President
Wesco
108 Liberty Street
Metuchen, New Jersey 08840

Dear Mr. Demeter,

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 Wesco (“Wesco,” “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, Wesco 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>.

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

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 Wesco 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 or (202) 343-9729 if you have any questions regarding this letter.

Sincerely,



Aaron Szabo
Assistant Administrator

Enclosure: Information to Send to EPA

Enclosure

Information to Send to EPA

Provide the following information to the EPA, printed in English. Such information shall pertain to Wesco's efforts associated with Halon-1211 (CF₂BrCl) and Halon-1301 (CF₃Br) destruction projects.

1. How many halon destruction projects has your company participated in to earn carbon credits under the ACR or other registries for carbon credits?
2. How are the halons sourced, recovered, transported, and stored prior to receipt by the carbon credit project developer (e.g., Tradewater, LLC)?
3. Provide the following information for each halon destruction project for carbon credits that you've participated in or are participating in, including projects under development:
 - a. Project ID
 - b. Project summary
 - c. Project name
 - d. Project developer that is facilitating the project
 - e. Methodology the project was or is being developed under
 - f. Types and quantities of halons destroyed or intended to be destroyed
 - g. Date the project developer purchased the halons from your company and the types and quantities purchased
 - h. Source(s) for all the halons included in the project
 - i. Results of testing and verification of the material quality and composition (i.e., purity)
 - j. Any information, including signed certifications, verifying that the halons were sourced from equipment or systems in the United States or Canada
 - k. Any information, including signed certifications, verifying that the halons were not in a strategic stockpile (i.e., being maintained for fire suppression systems in aviation, military use, shipping, oil and gas, computer rooms, and other critical applications)
 - l. Payment received for the halons
 - m. Location and name of the facility where the halons were or will be destroyed
 - n. All records to document and verify the quantity and quality of the halons that was shared with the project developer, including any signed certifications
4. Are there any prospective halon destruction projects under development that you expect to participate in? If yes, provide the following information for each project:
 - a. Project summary
 - b. Methodology the project is being developed under
 - c. Date the project developer-initiated communication with your company
 - d. Types and quantities of halons the project developer intends to destroy
 - e. Intended source(s) of halons and supporting documentation to verify where the halons were or will be sourced
 - f. Results of testing and verification of the material quality and composition (i.e., purity)
 - g. Location and name of the facility where the project developer intends to destroy the halons

- h. Expected month and year of destruction
 - i. Expected month and year of export, if being destroyed abroad
 - j. Entity the project developer intends to have validate and/or verify the project
 - k. Total number of carbon credits that would be associated with the project
5. For each project identified in questions 3 or 4, could the halons have been reclaimed and resold for use in fire suppression equipment? If not, explain why.
 6. For any Halon-1211 or Halon-1301 included in projects identified in questions 3 or 4, who are the typical customers for that material?
 7. EPA understands your company sold 60,000 lbs of Halon-1301 to Tradewater, LLC, and that they intended to destroy that material in France.
 - a. Could the Halon 1301 have been reprocessed/reclaimed for reuse? If not, is there documented evidence that the purity or any other factors of the recovered or recycled halons does not technically allow for reprocessing/reclamation and subsequent re-use?
 - b. Is Tradewater, LLC, still planning to destroy any of this material for carbon credits?
 - c. If yes, how much do they intend to destroy?
 - d. If yes, what is the location and name of the facility where they intend to destroy the halons and what destruction technology is used at the facility?
 - e. If being exported, what month and year are they planning to export the halons, from which port, and from which country?
 8. Provide a list of facilities that you have worked with or are working with to destroy Halon-1211 or Halon-1301. Include company contact information.

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.