



Lifecycle Analysis of End-of-Life Management Options for High-Global Warming Potential Gases

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Agenda

- **Background**
- **Project Objectives**
- **Part I: Household Refrigerators/Freezers**
- **Part II: Building Foam (Demolition)**
- **Part III: Disposable Refrigerant Cylinders**
- **Part IV: Other Stationary Refrigeration/Air Conditioning Equipment**
- **Part V: Fire Extinguishing Agents & Miscellaneous Gases**

Background

- **High-Global Warming Potential (GWP) gases primarily include ozone-depleting substances (ODS) & hydrofluorocarbons (HFCs)**
 - ◆ Refrigeration & air conditioning (AC) equipment
 - ◆ Foam blowing agents: building insulation, refrigerated appliances, other products
 - ◆ Fire extinguishing agents
 - ◆ Other: solvents, aerosols, semiconductor manufacture, electrical power systems
- **Very potent GHGs: thousands times greater than CO2**
 - ◆ In largest sector, Ref/AC, GWPs range up to 8,100 (based on SAR)
- **Emissions occur primarily through (1) leaking systems and (2) during disposal process**
- **Once released, gases have a long atmospheric lifetime (up to 100 years or more)**

Background

- High-GWP gases ~3% of CA's GHG emissions today, but projected to rise to ~ 8% by 2020

Sector	All High-GWP GHGs			Kyoto Gases Only		
	2020 BAU Emissions (MMT _{CO₂eq})	Percent of BAU	Reduction Potential by 2020 (MMT _{CO₂eq})	2020 BAU Emissions (MMT _{CO₂eq})	Percent of BAU	Reduction Potential by 2020 (MMT _{CO₂eq})
Stationary Refrigeration/AC	45.4	72%	10.3	33.9	73%	7.2
Mobile AC	7.1	11%	3.5	7.1	15%	3.5
Foams	5.8	9%	1.0	1.4	3%	1.0
Fire Extinguishing	0.5	1%	0.1	0.2	0%	0.1
All Other Sources	4.5	7%	1.4	4.2	9%	1.4
Total	63.3	100%	16.3	46.8	100%	13.2

- AB 32 requires annual reductions of 174 MMT_{CO₂eq}
 - Several ARB regulations target high-GWP emissions to help achieve goal
- AB 32 Scoping Plan identified recovery & destruction of high-GWP materials as an option for providing further reductions

Project Objectives

Key Questions:

- What are the costs and benefits of reducing high-GWP gas emissions at disposal?
- Which reductions could be achieved through regulatory or non-regulatory measures?

Purpose of Study

- Quantify baseline emissions associated with current EOL management of high-GWP gases
- Quantify lifecycle costs and benefits of alternative EOL management scenarios
- Calculate GHG abatement costs (\$/MTCO₂eq) to inform ARB policy decisions

Organization

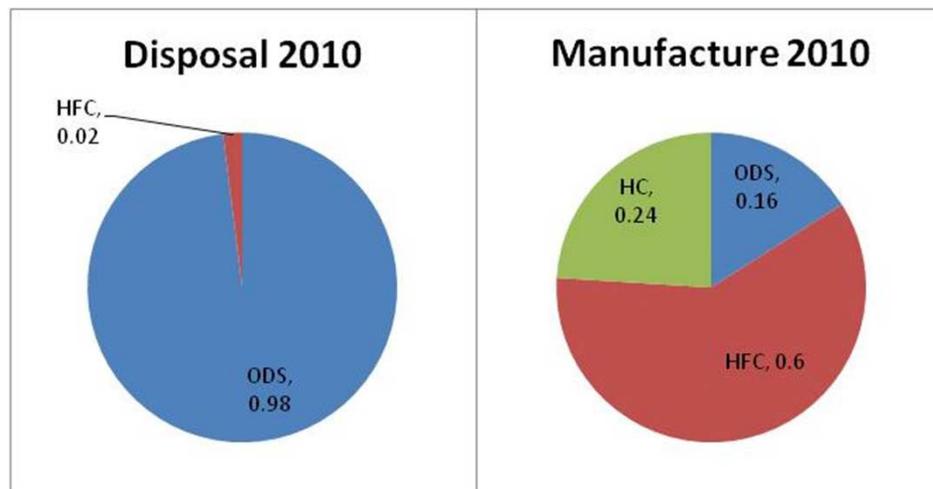
- **Current situation**
- **Alternative management options**
- **GHGs avoided**
- **Cost effectiveness**

Part I: Household Refrigerators/Freezers

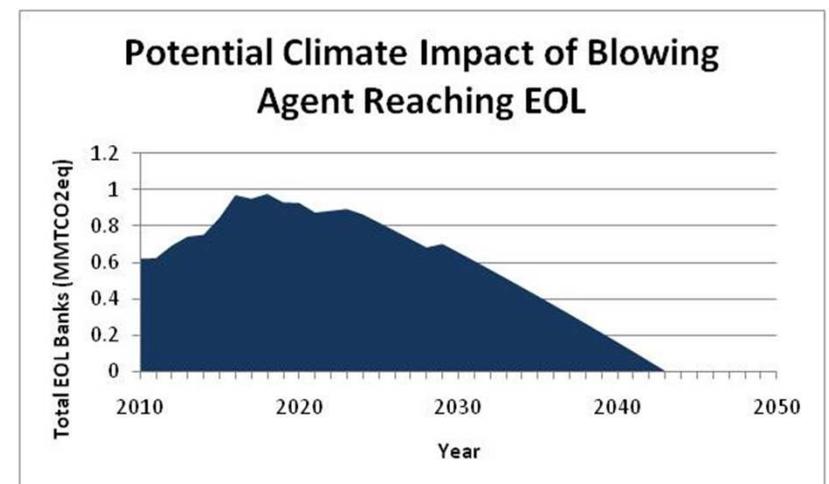


Current Situation

- Nearly 1 million refrigerators/freezers disposed annually in CA
 - ◆ Units contain ODS/HFC refrigerants (~0.5 lb) and foam blowing agent (~2 lbs)
- At disposal, federal law requires proper handling of refrigerant and other hazardous substances
 - ◆ No requirements for foams
- Depending on date of equipment manufacture, foam contains CFC, HCFC, HFC, or HC blowing agents



Increasingly, units will transition to HCs & other low-GWP agents



EOL banks peak in 2018
(on carbon-weighted basis)

Current Situation

- Since 2006, only a Certified Appliance Recycler (CAR) may remove materials that require special handling from appliances in CA
- Over 170 CARs operate in CA
 - ◆ Most dispose of units as follows:
 - Refrigerant: recovered & reused/destroyed
 - Metals, plastics, glass: recycled
 - Foams: put in auto shredder then landfilled
 - ◆ 3 dedicated appliance recyclers (DARs) remove foam manually
 - Primarily for utility DSM programs
 - 15% of units in CA handled this way



Question: What are the lifecycle costs and benefits of different foam handling procedures?

Alternative Management Options: 100% Foam Recovery

1. Manual foam recovery at existing CA facilities

◆ BAU

- 85% at existing CARs, using handheld saws
- 15% at existing DARs, using handheld/automated saws

2. Manual foam recovery at dedicated appliance recycling facilities

◆ Current 3 DARs + 7 new facilities in CA

- Recovery using handheld/automated saws

3. Fully-automated foam recovery at dedicated appliance recycling facilities

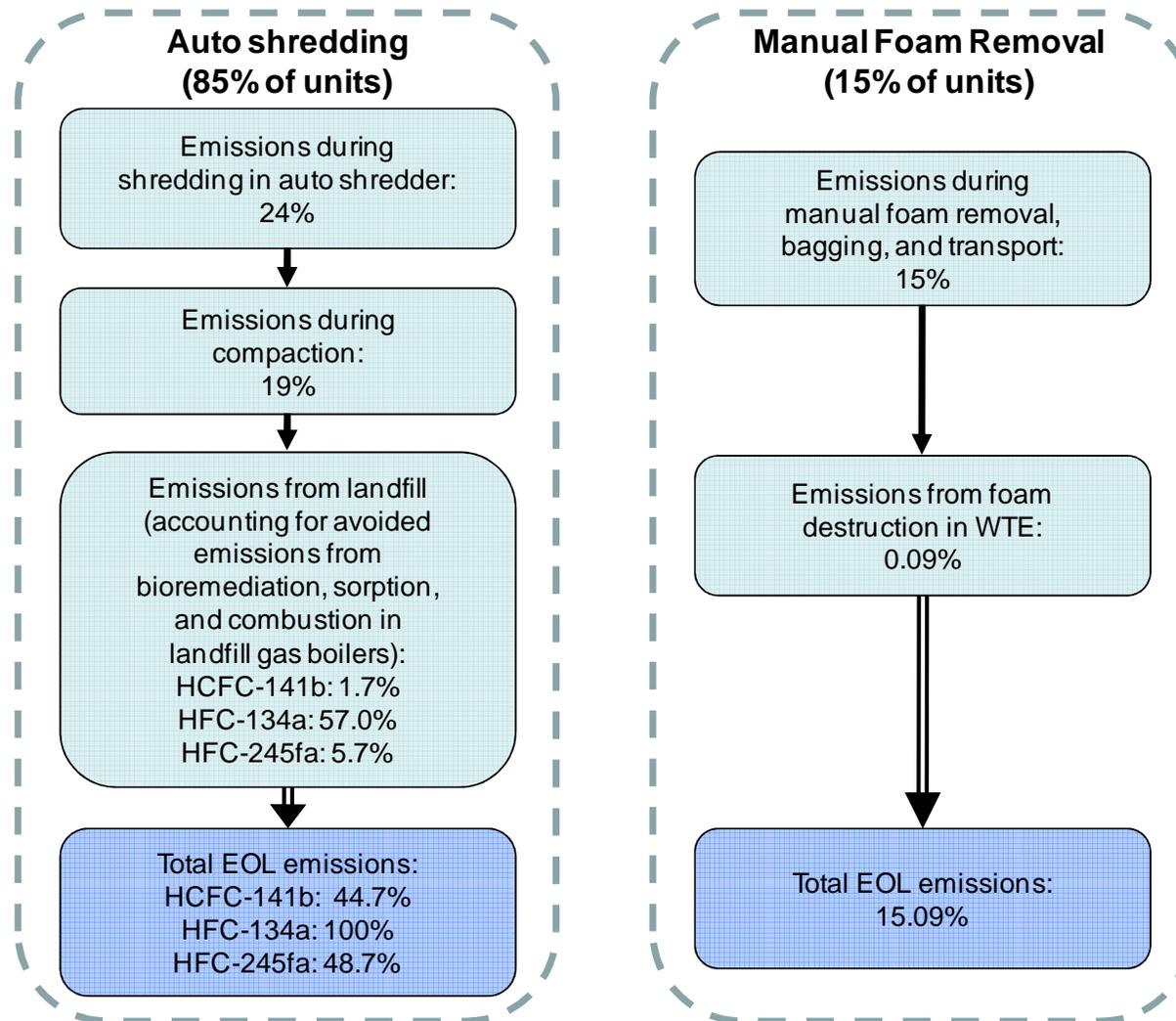
◆ More advanced technology used in Europe, Japan, elsewhere

- High capacity; would require 5 new facilities in CA

Key Parameters

- **Boundary of Analysis**
 - ◆ Units containing ODS and HFC foams only
 - ◆ Focus on foam treatment (not the handling of other components)
- **Emissions Analyzed**
 - ◆ Blowing agent (based on foam treatment)
 - ◆ Energy consumption during foam handling
 - ◆ Transport
- **Costs Analyzed**
 - ◆ Transport fuel
 - ◆ Labor: transport and foam handling
 - ◆ Energy consumption
 - ◆ Operations and maintenance
 - ◆ Foam disposal
 - ◆ Capital costs of facility rental and equipment purchase

BAU Foam Disposal Assumptions

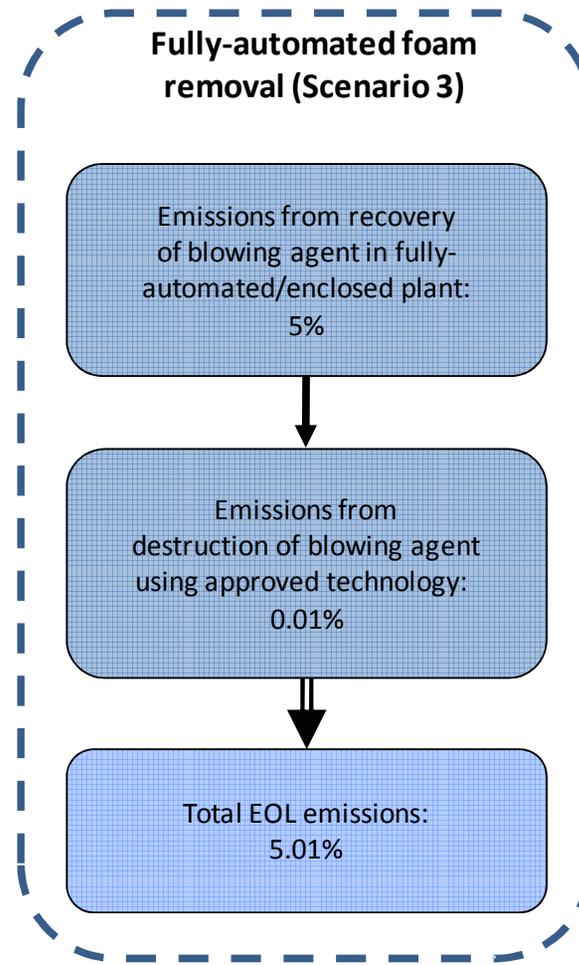
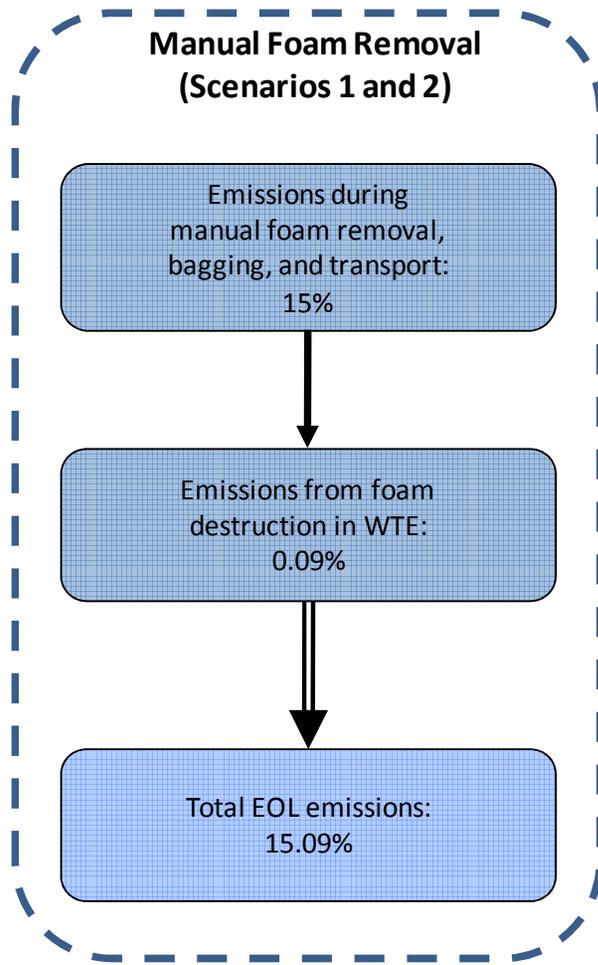


Areas of uncertainty:

- Emissions avoided in landfill can vary
 - Relied on published literature, CAR protocol, industry experts
- Emissions from manual recovery; studies vary between 5% -24%
 - Relied on published literature, industry experts
- Conservative assumptions used

Key Assumptions in Alternative Management Options

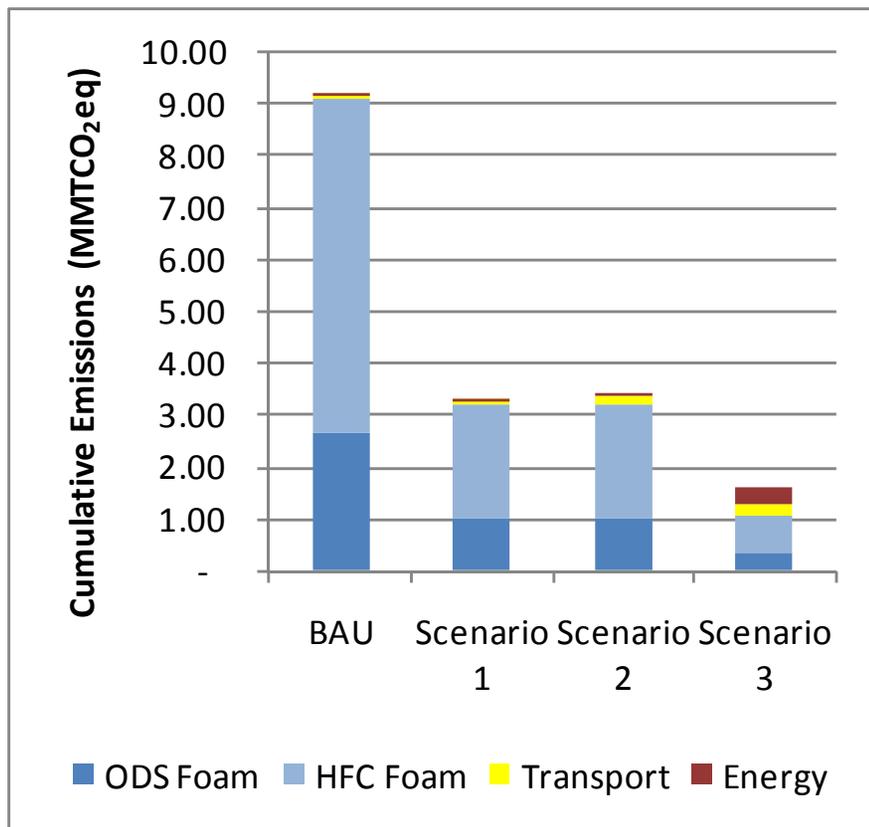
Percent of Foam Remaining at EOL



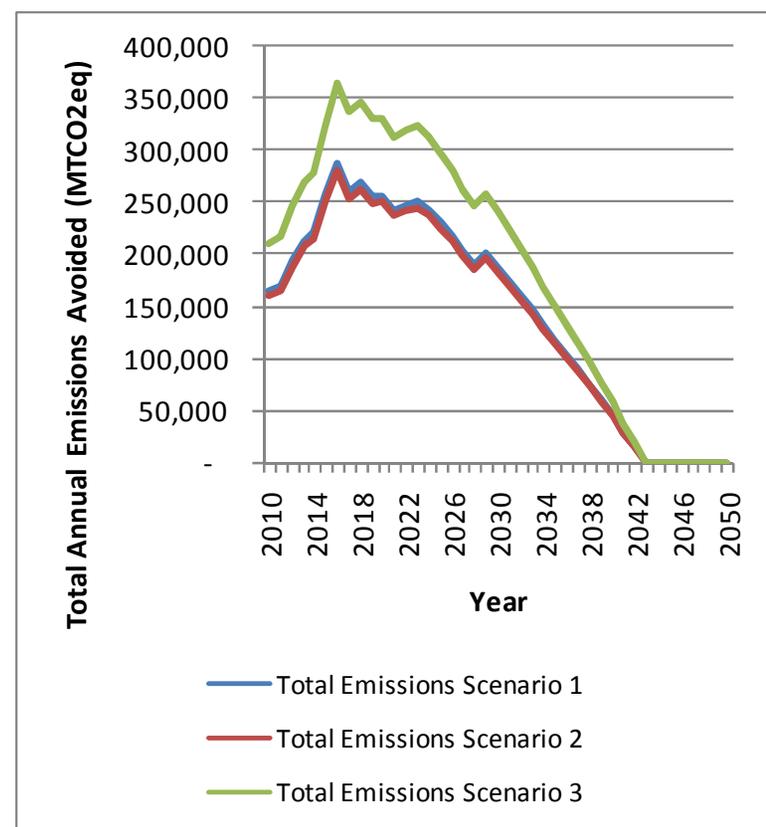
- 10% more foam capture using more sophisticated technology
- But greater transport required for destruction of concentrated blowing agent
 - ◆ Facilities located in AR, UT, TX

Results: GHG Emissions Comparison

Cumulative GHG Emissions (MMTCO₂eq), 2010-2050



Annual GHG Emissions Avoided (MTCO₂eq)



Results: Cost Effectiveness

Per Unit Costs (2010)

Activity or Stage	Costs (\$)			
	BAU	Scenario 1	Scenario 2	Scenario 3
Total Per-unit Costs	\$12	\$29	\$55	\$49
Estimated total per-unit costs including metal recycling and refrigerant recovery	(\$8)	\$9	\$35	\$28
Total Incremental Per-unit Costs	NA	\$17	\$43	\$37

Total Costs (2010-2020)

Total Costs and GHG Emissions Avoided (2010-2020)	HFC-Containing Units			Total		
	Scenario	Scenario	Scenario	Scenario	Scenario	Scenario
	1	2	3	1	2	3
NPV Incremental Cost (\$ millions)	\$28	\$69	\$64	\$171	\$421	\$387
Average Cost per MTCO ₂ eq Avoided	\$23	\$58	\$42	\$67	\$170	\$119

- Cost to reduce HFC emissions range from \$23- \$58/MTCO₂eq, depending on method used
- Fully-automated foam recovery costs less than manual recovery—on per unit and MTCO₂eq basis

Findings

- Fully automated foam recovery results in greatest emission savings
 - ◆ ~0.2 MMTCO₂eq can be reduced from HFC-containing units in 2020
- Manual recovery using existing CAR facilities also results in GHG savings—and at lowest cost
 - ◆ \$23/MTCO₂eq for HFC-containing units
- Great uncertainty associated with emissions avoided in landfills; if emissions not avoided, results are significantly different:
 - ◆ Reductions would more than double: 0.5 MMTCO₂eq in 2020 (HFC units)
 - ◆ Cost effectiveness would be less than half: \$11/MTCO₂eq (HFC units)
- Best opportunity to reduce emissions from appliance disposal is in near-term, before high-GWP gas-containing appliances reach retirement

Part II: Building Foam (Construction & Demolition-C&D)



Current Situation

- Caleb Management Services prepared foams inventory for ARB in 2010; looked at current practices
- At EOL, C&D foam typically combined with other non-hazardous waste and landfilled
- No precedent for recovery of C&D foam for safe disposal in US/CA, but some in Europe
 - ◆ Polyurethane (PU) sandwich panels—which contain foam between two facing materials (usually steel panels)—can most easily be recovered from C&D waste

Question: what are the lifecycle costs and benefits of recovering C&D panel foam in CA, where feasible?

BAU: Disposal of Panel Foams

- **According to Caleb (2010):**
 - ◆ 80% of panel foam is open shredded, then landfilled; 20% directly landfilled
 - ◆ 1st year of disposal is 2016

Blowing Agent (MT) in PU Panels in CA Buildings Reaching EOL

Year	CFC-11	HCFC-141b	HFC-245fa	HCs
2010	-	-	-	-
2015	-	-	-	-
2020	1.5	-	-	-
2025	2.0	2.0	-	-
2030	-	91.5	-	-
2035	-	19.2	57.6	51.2
2040	-	-	256.9	256.9
2045	-	-	472.5	472.5
2050	-	-	667.1	667.1
Total	32.6	688.7	6,256.8	6,212.4

Alternative Management Options

- **Separation and recovery of blowing agent from (a) 25% or (b) 50% of C&D panels reaching EOL**
 - ◆ PU panel foam separated from other C&D waste and trucked to appliance recycling facility
 - ◆ Blowing agent separated from foam panel fluff in fully-automated/ enclosed appliance shredder
 - ◆ Blowing agent sent for destruction in hazardous-waste permitted destruction facility



Key Parameters

■ Emissions

- ◆ Foam blowing agent (BA)
- ◆ Energy consumption for foam treatment
- ◆ Transport

■ Costs

- ◆ Foam separation/collection (alternative scenario only)
- ◆ Incremental transport
- ◆ Foam handling: shredding vs. processing for BA recovery (energy and labor)
- ◆ Foam/blowing agent disposal (landfilling vs. destruction of BA)

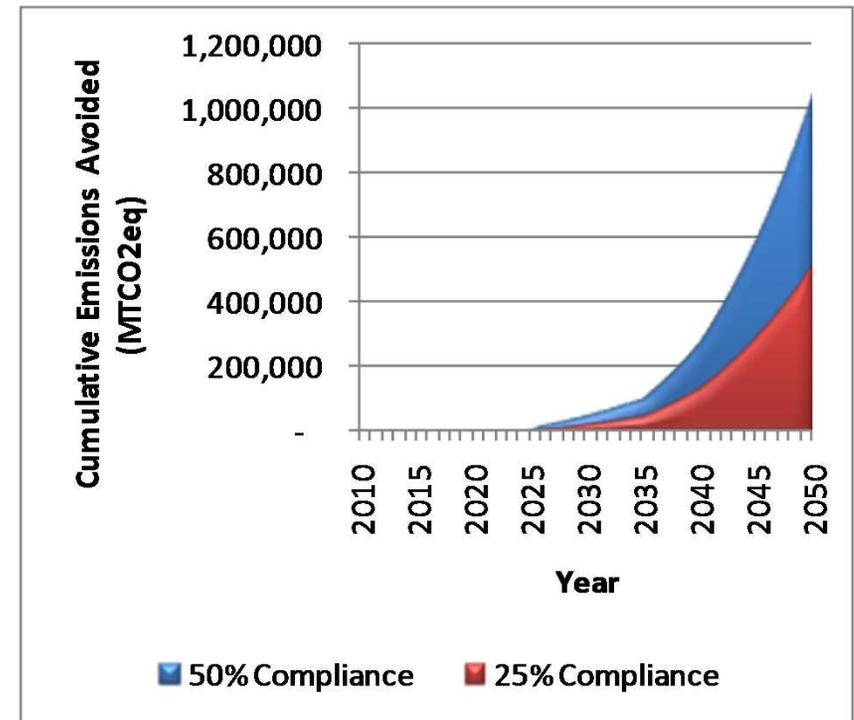
Foam Emission Assumptions

Blowing Agent	BAU							Alternative
	Shredding/Landfilling (80%)				Direct Landfilling (20%)			Blowing Agent Recovery and Destruction
	Shredding	Compaction	In Landfill	Total	Compaction	In Landfill	Total	
CFC-11	24%	19%	0.3%	43%	19%	0.5%	19%	10%
HCFC-141b	24%	19%	1.7%	45%	19%	2.3%	21%	10%
HFC-245fa	24%	19%	5.7%	49%	19%	8.1%	27%	10%

- Uncertainty about BAU emissions avoided in landfills
 - ◆ To be conservative, high rates of landfill bioremediation/sorption/combustion assumed
- As a result, alternative management scenario only reduces between 9-39% of BAU emissions, depending on BA type

Results: GHG Emissions Avoided

- Significant emissions reductions possible
- GHG reductions partially offset by increased emissions associated with transport and energy consumption for foam processing
- 50% adoption rate: 1.04 MMTCO₂eq reduced by 2050 (HFC & ODS)
- Avoided emissions of HFCs are zero through 2030; no HFCs projected to reach EOL until 2031



Results: Cost Effectiveness

Cost Effectiveness (\$/MTCO₂eq)

	25% Compliance			50% Compliance		
	ODS	HFC	Total	ODS	HFC	Total
Costs, 2010-2050 (\$ million)	\$10.0	\$43.4	\$53.4	\$20.1	\$86.8	\$106.9
Cost Effectiveness (\$/MTCO ₂ eq)	\$242	\$90	\$102	\$242	\$90	\$102

- Benefits and costs not incurred until 2016 for ODS; 2031 for HFCs
- Cost effectiveness is \$90/MTCO₂eq for HFCs under optimal BAU landfill conditions
 - ◆ Assuming zero emissions avoided in landfills, cost effectiveness ~\$33/MTCO₂eq

Findings

- No precedent for C&D foam recovery in CA
- No GHG emission benefits to be realized until ~2030
- In later years, small but significant GHG reductions can be achieved
 - ◆ In 2050, recovery of HFC panel foams could reduce 0.1 MMTCO₂eq
- Additional research needed to assess:
 - ◆ Infrastructure needed to support alternative scenario considered
 - ◆ Other methods of PU panel foam handling, which may be more cost-effective

Part III: Disposable Refrigerant Cylinders



Current Situation

- ~732,000 disposable 30-lb. cylinders used annually in CA to service refrigeration/AC equipment
 - ◆ Stationary equipment: HCFC-22 and R-410A most common
 - ◆ Mobile: HFC-134a most common

- Two concerns:
 1. Refrigerant “heel” emissions
 - When deemed “empty,” cylinders contain a “heel” of ~1.1 lbs of refrigerant/cylinder (~4%)

 2. Metal recycling or disposal vs. reuse
 - Recycling of metals common (~6.5 lbs of steel)

Current Situation

- High-GWP refrigerant heel can have significant GHG impacts
 - ◆ e.g., 0.03 MTCO₂eq. per R-410A cylinder
- January 1, 2011: CA's Refrigerant Management Program took effect
 - ◆ Requires evacuation to 15-inch mercury vacuum prior to cylinder disposal (California Code of Regulations §95390)
 - Remaining heel ~0.2% (~0.05 lbs/cylinder)
- GHG impact of refrigerant heel emissions:
 - ◆ Full compliance w/ RMP: ~0.03 MMTCO₂eq/year
 - ◆ Non-compliance w/ RMP: ~0.50 MMTCO₂eq/year

Alternative Management Option

- **Replace disposable cylinder fleet with reusables, 5-year phase-in**
 - ◆ Assume producer responsibility scheme: refillable cylinders are returned to refrigerant manufacturer
 - ◆ Ensures heel not released, cylinders refurbished and reused for 20 years

Key Parameters

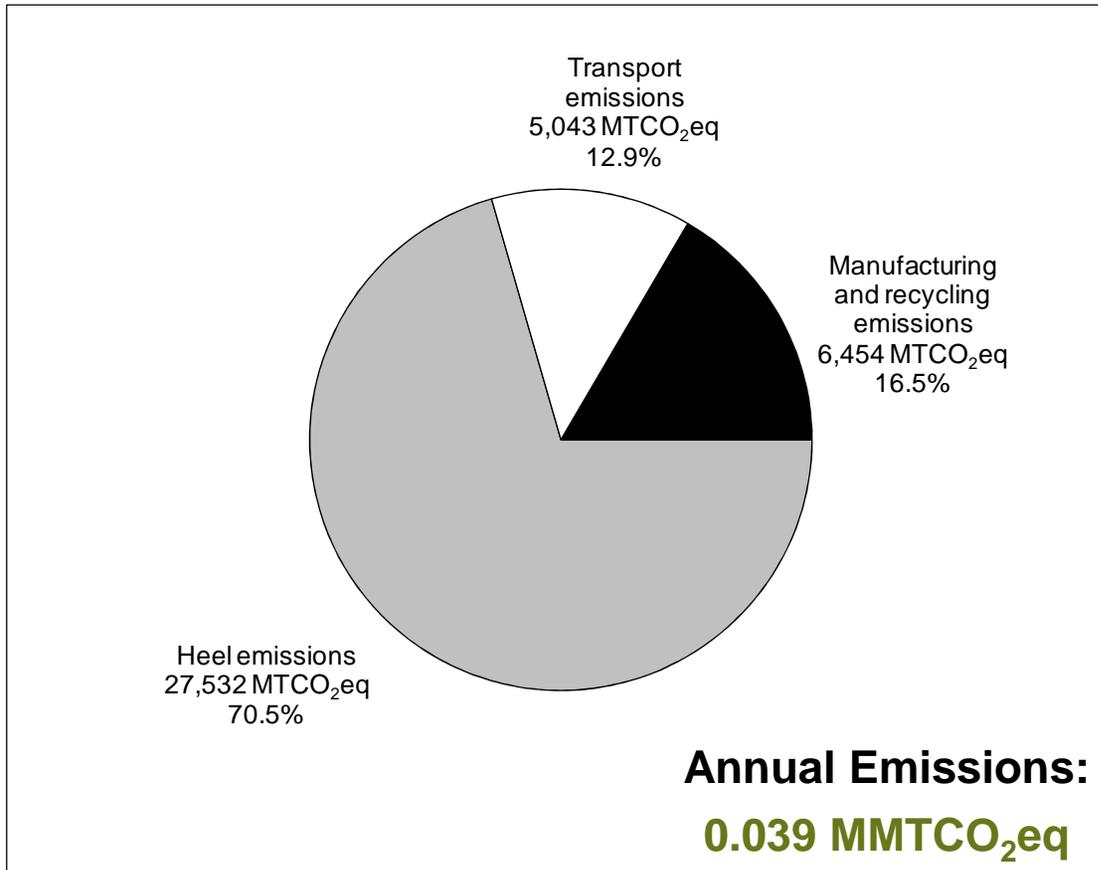
- **Emissions**

- ◆ Cylinder manufacture and reuse/ recycling/ disposal
- ◆ Heel
- ◆ Transport

- **Costs**

- ◆ Cylinder manufacture
- ◆ Labor: for heel evacuation, transport
- ◆ Metal recycling (savings)
- ◆ Cylinder refurbishment (for refillables)
- ◆ Transport fuel
- ◆ No capital costs

Annual BAU Emissions



BAU...

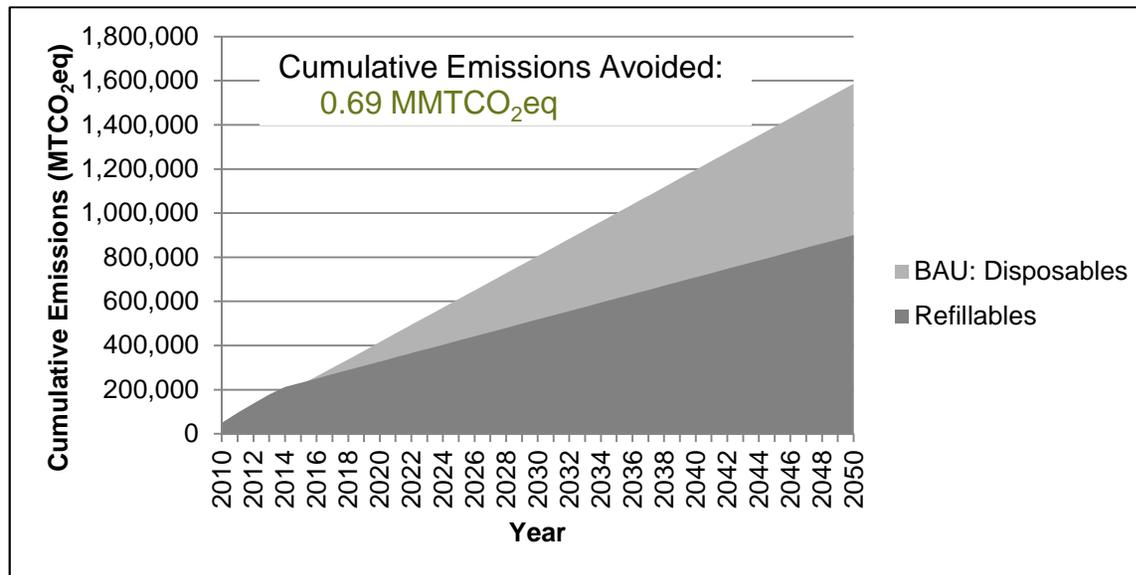
- Assumes full compliance with evacuation requirements
- 75% of cylinders recycled

Annual emissions assuming no compliance with RMP:
0.50 MMTCO₂eq

Results: GHG Emissions Comparison

	GHG Emissions Avoided (MTCO ₂ eq)					Total
	Direct		Indirect			
	ODS Heel	HFC Heel	Transport	Manufacturing	Recycling Credits	
2010-2020	48,269	142,725	(48,244)	(55,163)	717	19,924
2010-2050	48,269	803,505	(198,693)	29,835	3,108	686,023

Cumulative Net GHG Emissions (2010-2050)



If non-compliance with cylinder evacuation:

- Cumulative emissions avoided by 2050: 14.0 MMTCO₂eq

Cost Effectiveness

Costs per Cylinder Used Annually, Post-2015

Disposables	Refillables
\$13.16	\$25.25

Cost Effectiveness of Alternative Management Scenario (\$/MTCO₂eq), 2010-2050

Total Costs	HFC Only	Total (ODS + HFC)
Full compliance with cylinder evacuation	\$254	\$387
Non-compliance with cylinder evacuation	\$14	\$20

Findings

- Transition to refillable cylinders could reduce GHG emissions from refrigerant heels, in spite of higher transport
 - ◆ Reductions are significant if low levels of compliance with heel evacuation in BAU
- Costs to achieve reductions are high assuming compliance with RMP (\$254/MTCO₂eq for HFCs)
 - ◆ But very reasonable otherwise: \$14/MTCO₂eq

Part IV: Other Stationary Refrigeration/AC Equipment

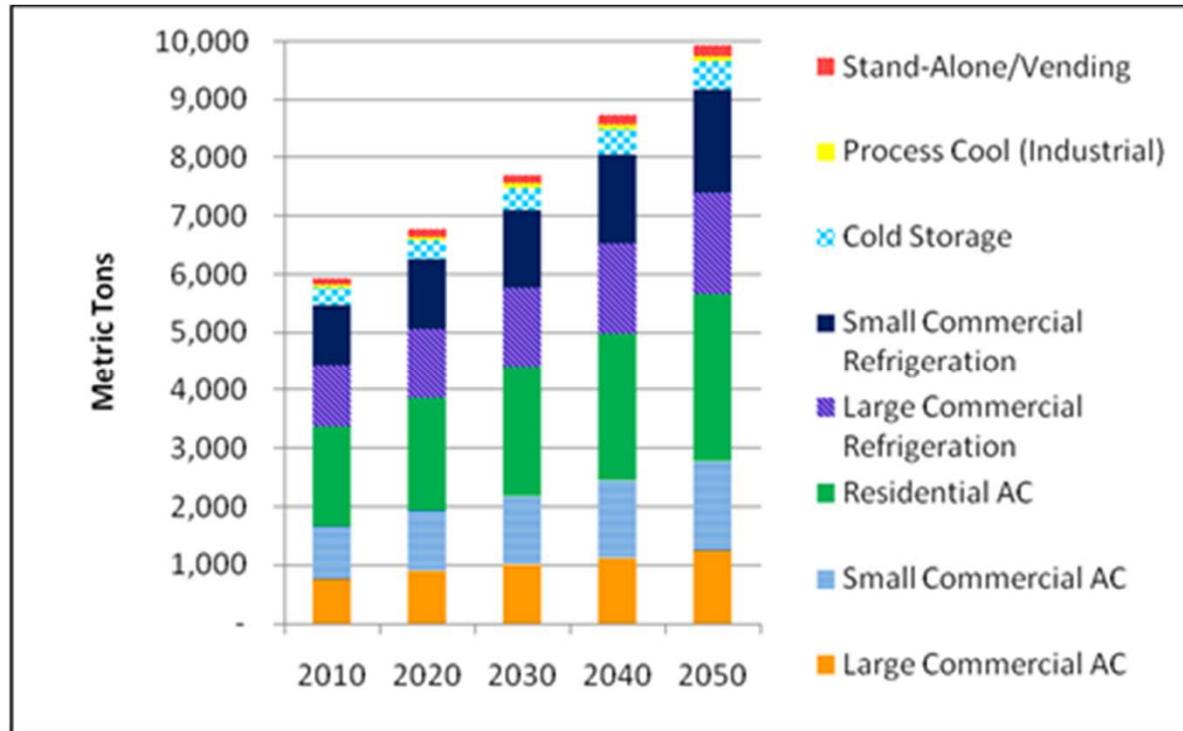


Current Situation

- Apart from household refrigerators, ~17 million units of other stationary refrigeration/AC equipment are installed in CA
- Federal law requires that refrigerant be recovered at equipment EOL and either stored, recycled, reclaimed, or destroyed
 - ◆ Not always cost-effective—especially for equipment with small charge size and/or refrigerants with low market value
 - ◆ Compliance is difficult to enforce
- ARB's Refrigerant Management Program focuses on reducing emissions during operation of stationary equipment; does not directly address EOL issues

Question: What are the lifecycle costs and benefits of complying with federal regulations at equipment EOL?

Quantities Reaching EOL (MT)



Source: CARB (2010)

- Based on ARB inventory, greatest quantities reaching EOL are from: residential AC, commercial refrigeration, and small commercial AC

Alternative Management Options

- **Assess lifecycle costs & benefits for:**
 - ◆ Various levels of compliance and recovery efficiency
 - 10%, 50%, and 90% refrigerant recovery scenarios
 - Assumes 100% of charge available at EOL
 - ◆ Various refrigerant fates
 - Recovery [+ Storage]
 - Recovery + Reclamation
 - Recovery + Destruction



Key Parameters

■ Emissions

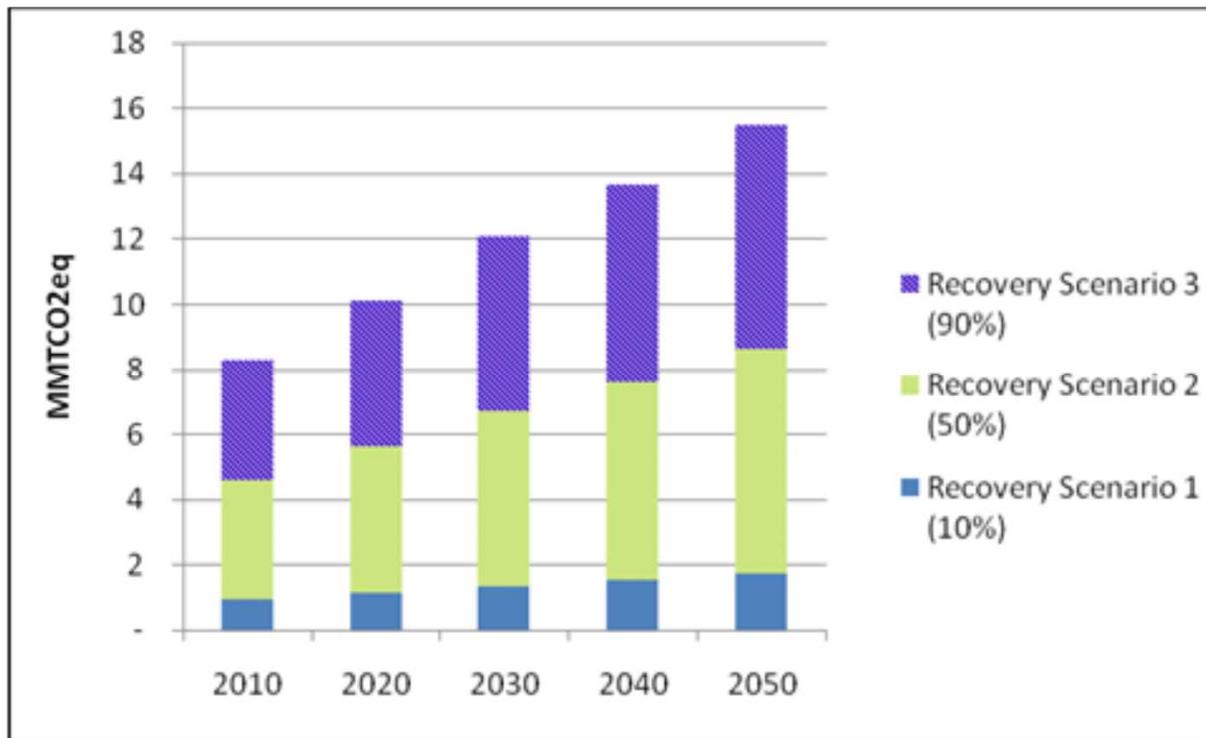
- ◆ Refrigerant avoided
- ◆ Transport to reclamation or destruction facilities
- ◆ Energy consumption for reclamation

■ Costs

- ◆ Transport: fuel and labor
- ◆ Refrigerant recovery
- ◆ Refrigerant savings for reclamation
- ◆ Energy consumption for reclamation
- ◆ Refrigerant destruction

Assumptions based on previous LCAs, augmented with information from refrigerant reclaimers

Results: Annual GHG Emissions Avoided

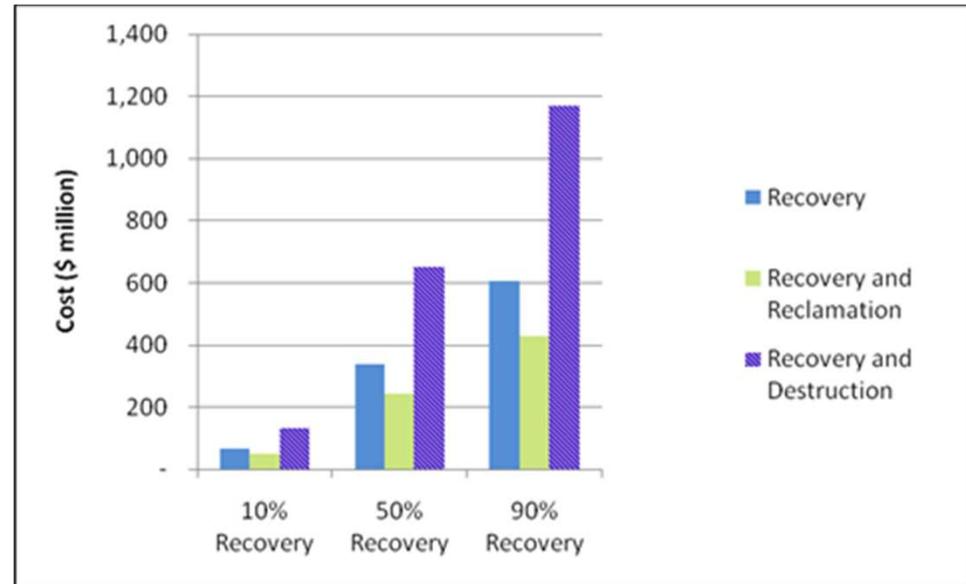


- For HFCs alone, a 10% increase in recovery can reduce 7 MMTCO₂eq from 2010 to 2020
- By 2020, 90% recovery can reduce
 - ◆ 99 MMTCO₂eq from HFC/ODS

Results: Cost Effectiveness

- **Low-cost GHG reductions**
 - ◆ \$1-\$5/ MTCO₂eq
 - ◆ Reclamation is lowest cost
 - ◆ Cost effectiveness increases over time, as HFCs are phased in

Cumulative Costs (2010-2050)



Incremental \$/MTCO₂eq 2010-2050 (NPV, 5%)

Year	HFC Only			Total		
	Recovery	Recovery/ Reclamation	Recovery/ Destruction	Recovery	Recovery/ Reclamation	Recovery/ Destruction
2010-2020	\$2.13	\$1.54	\$4.11	\$2.60	\$1.88	\$5.01
2010-2050	\$1.06	\$0.76	\$2.04	\$1.25	\$0.90	\$2.40

Findings

- Significant GHG savings can result from recovery from ref/AC equipment at EOL
 - ◆ Even with only 10% recovery, >1 MMTCO₂eq could be reduced in 2020 from ODS/HFC equipment; 11 MMTCO₂eq from 2010-2020
 - ◆ Recovery most critical from residential AC, commercial AC, large commercial refrigeration
- Cost effective GHG reductions (<\$2.50/MTCO₂eq)
- Actual recovery levels will depend on number of technicians performing recovery, recovery practices employed, and quantities remaining at EOL
- Approaches for increasing recovery could include:
 - ◆ Regulatory enforcement
 - ◆ Fee/tax on refrigerant sales
 - ◆ Producer responsibility schemes



Part V: Fire Extinguishing Agents & Miscellaneous Gases



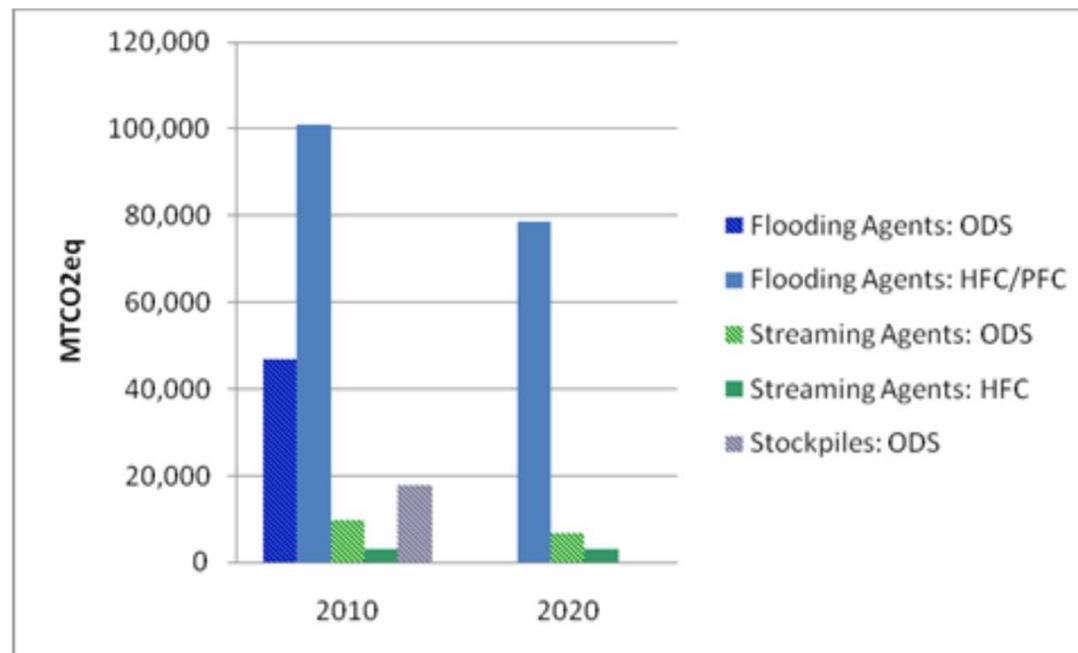
Current Situation

- **Institute for Research and Technical Assistance (IRTA) estimated inventory of high-GWP gases in CA from fire sector and misc. stockpiles**
 - ◆ Fire protection sector: total flooding systems & portable extinguishers
 - ◆ Stockpiles: ODS solvents
- **At EOL, federal law requires that these gases be recovered and stored/recycled/reclaimed/destroyed**
 - ◆ Recovery and reuse at EOL is common in the fire sector
 - ◆ Fate of stockpiles highly uncertain; long-term storage could lead to slow leakage

Question: what are the lifecycle costs and benefits of complying with federal regulations?

Estimated EOL Banks: 2010, 2020

- Quantities reaching EOL calculated based on IRTA banks & equipment lifetime assumptions
 - ◆ Flooding: 20 yrs
 - ◆ Streaming: 12 yrs



Alternative Management Options

- **Assess costs & benefits for**
 - ◆ Recovery [+Storage]
 - ◆ Recovery + Reclamation
 - ◆ Recovery + Destruction

Key Parameters

- **Emissions**

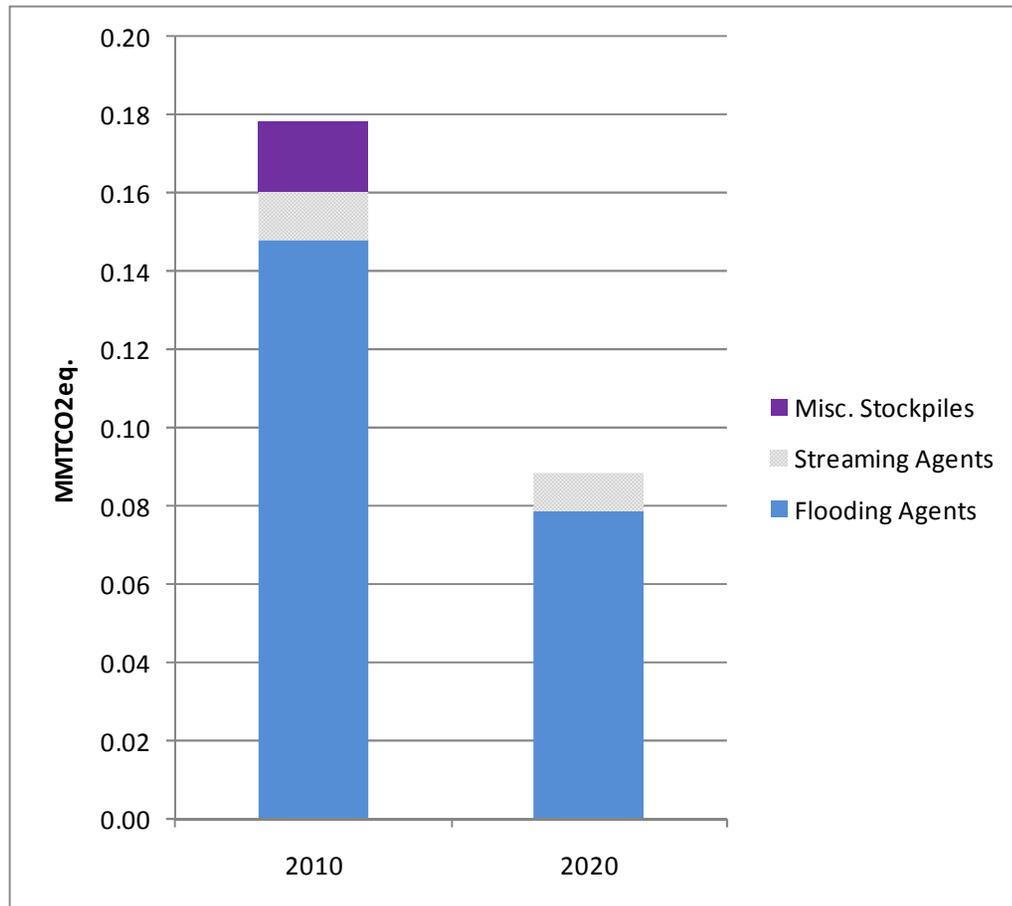
- ◆ High-GWP gases
- ◆ Transport to reclamation or destruction facilities
- ◆ Energy consumption for reclamation

- **Costs**

- ◆ Transport of refrigerant to reclamation/destruction facilities
- ◆ Labor for transport
- ◆ Agent savings (for reclamation)
- ◆ Energy consumption

**Assumptions consistent with other LCAs; additional information obtained from reclaimers of fire extinguishing agents.*

Results: Annual GHG Emissions Avoided



- By 2020, potential to avoid ~1.5 MMTCO₂eq from recovery of fire equipment & stockpiles
- Indirect GHG emissions associated with reclamation and destruction reduce GHG savings by 0.1% - 1.1%

Results: Cost Effectiveness

Incremental \$/MTCO₂eq, 2010-2020

Year	HFCs/PFCs Only			Total		
	Recovery	Recovery/ Reclamation	Recovery/ Destruction	Recovery	Recovery/ Reclamation	Recovery/ Destruction
Flooding	\$1.94	(\$1.20)	\$4.06	\$1.70	(\$1.05)	\$3.56
Streaming	\$0.79	(\$0.49)	\$1.66	\$3.79	(\$2.34)	\$7.93
Stockpiles	-	-	-	\$1.79	(\$1.11)	\$3.75

- Reclamation reduces GHGs at cost savings
- Recovery and/or destruction reduces emissions at low cost (<\$4/MTCO₂eq for HFCs/PFCs)

Findings

- Proper management of ODS stockpiles and fire equipment at EOL could avoid nearly 1.5 MMTCO₂eq from 2010 – 2020 at low or negative cost (<\$5.00/MTCO₂eq)
- Fire protection sector: majority of emission reductions expected in BAU
 - ◆ Options could be considered to promote destruction of phased out gases (i.e., halons)—instead of reuse
- Solvent stockpiles: uncertainty over fate of stockpiles; eventual leakage a concern
 - ◆ Options could be considered to promote reclamation or destruction → e.g., stakeholder outreach/education, take-back programs, economic incentives

Wrap-Up

Conclusions

Proper EOL management of high-GWP gases can lead to significant GHG reductions

- Pursuant to AB 32 goals, additional HFC emission reductions could be realized from foam recovery
 - ◆ Near term: refrigerators/freezers
 - ◆ Long term: C&D PU panels
- Compliance with existing regulations is key to ensuring GHG reductions from stationary ref/AC, disposable cylinders, and fire equipment
 - ◆ Regulatory or voluntary measures could enhance compliance
- No regulations governing proper management ODS stockpiles
 - ◆ Outreach and/or financial incentives could be pursued

Conclusion

- Further research needed to
 - ◆ Explore technical and logistical options for C&D panel foam recovery in CA
 - Innovative approaches used in other countries and lessons learned
 - Unique infrastructure and markets in CA
 - ◆ Assess measures to promote compliance with federal and CA refrigerant recovery regulations at EOL
 - Stationary ref/AC
 - Disposable cylinders

Q&A

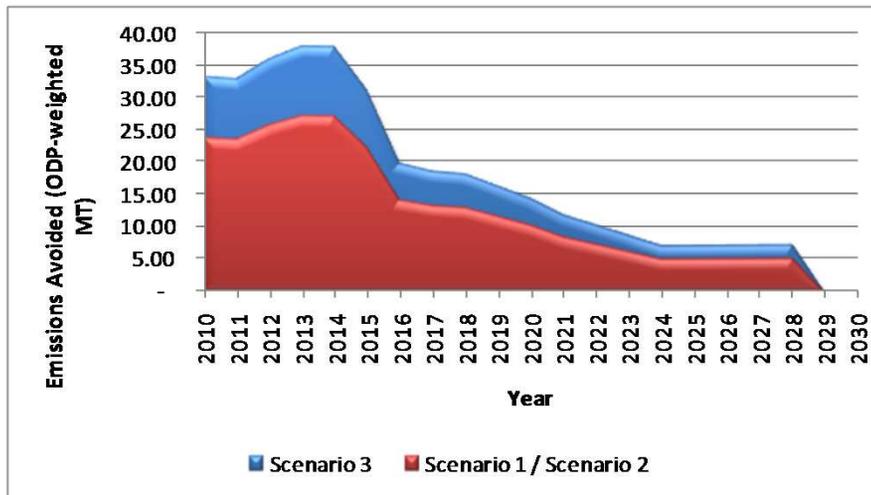
More Information

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Additional Slides

Appliance LCA: Other Emissions Avoided

Annual ODS Emissions Avoided (ODP-Weighted MT)



■ ODS emissions

- ◆ Emissions savings until 2029, then ODS fully retired
- ◆ Scenario 3 results in greatest emissions savings due to foam capture efficiency
- ◆ Total BAU ODS emissions (2010-2028): **417 ODP-weighted MT**

■ Criteria Pollutants

- ◆ Scenarios 2 and 3 result in very small incremental criteria pollutant emissions from transport and energy consumption

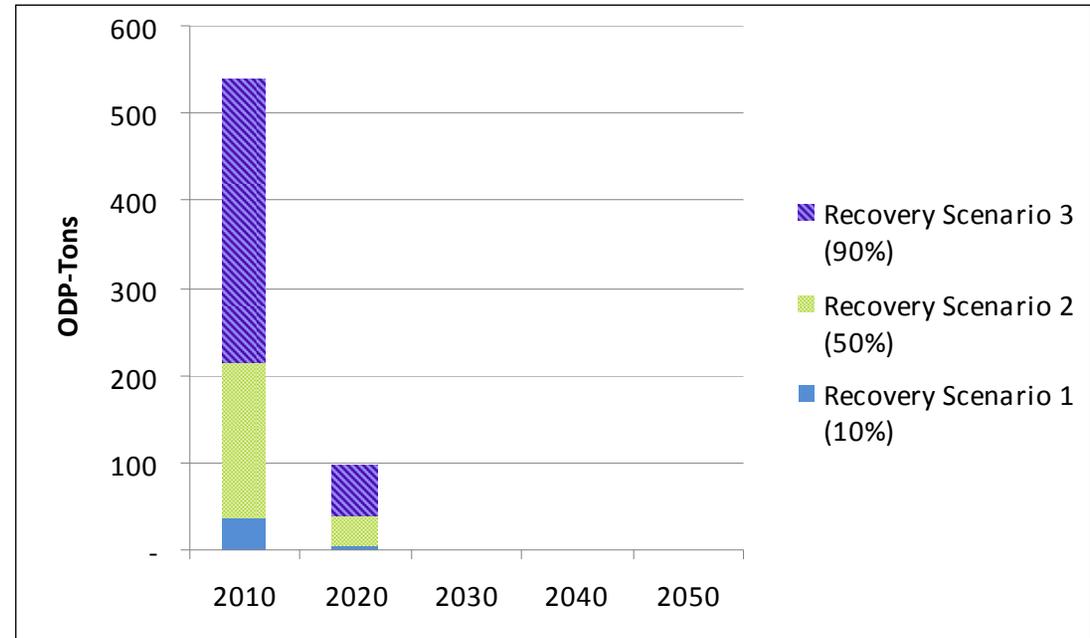
Other Stationary Ref/AC: Other Emissions Avoided

■ Ozone Benefits

- ◆ Potential to avoid 1,667 ODP tons by 2020 (at 90% recovery)
- ◆ ODS refrigerants virtually phased out by 2020

■ Criteria Air Pollutants

- ◆ Slight increases in NO_x , SO_x , PM_{10} , $\text{PM}_{2.5}$ associated with increased transportation



Disposable Cylinders: Other Emissions Avoided

- **ODS emissions will be reduced by 1.77 ODP-weighted MT from 2010-2019, until the phase-out of HCFC-22.**
- **Incremental, but insignificant criteria pollutant emissions from transport and cylinder manufacture.**

C&D Foams: Other Emissions Avoided

- **ODS emissions are avoided from 2016 through 2035, after which all ODS panel foam is phased out**
 - ◆ 25% compliance: 8 ODP-weighted MT avoided, 2010-2050
 - ◆ 50% compliance: 16 ODP-weighted MT avoided, 2010-2050
- **Incremental criteria pollutant emissions from transport and energy consumption during foam shredding and blowing agent recovery**

Fire & Misc. Stockpiles: Other Emissions

- **Ozone Benefits**
 - ◆ Potential to avoid 508 ODP tons by 2020
- **Criteria Air Pollutants**
 - ◆ Slight increases in NO_x , SO_x , PM_{10} , $\text{PM}_{2.5}$ associated with increased transportation

