

Validation & Verification Report for Hudson Technologies Company Hudson Reclamation Facility Smyrna, Georgia

American Carbon Registry

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1. Introduction

First Environment, Inc. (First Environment) provides this validation/verification report to Hudson Technologies Company (Hudson) as a deliverable of the American Carbon Registry (ACR) project validation and verification process. It covers the validation and verification of the following Project and reporting period:

Project Name	ACR Project ID	Reporting Period
HT HFC Reclamation Project Georgia 2021	ACR819	2/5/2021 – 12/30/2021

The Project reports emission reductions for a single 15-year crediting period beginning on February 5, 2021.

First Environment conducted validation and verification activities from the date of the kickoff meeting through March 13, 2023.

2. Objectives

The purpose of the validation and verification was, through review of appropriate evidence, to establish that:

- the objectives of the ACR Validation and Verification Standard Chapters 1.B and 8.B are met;
- the Project conforms to the requirements of the criteria discussed in Section 3 of this report; and
- the data reported are accurate, complete, consistent, transparent, and free of material error or omission.

Validation activities also include an assessment of the likelihood that implementation of the project will result in the emission reductions as stated by Hudson in the GHG Project Plan.

3. Validation/Verification Scope & Criteria

Specific scope metrics for the validation/verification are outlined in the table below:

Geographic Boundaries	Hudson Reclamation Facility Smyrna, GA
Greenhouse Gases Verified	Emissions reductions (expressed in units of Carbon Dioxide equivalents (CO ₂ -e) resulting from HFC reclamation and resale to displace virgin material
Reporting Period	2/5/2021 – 12/30/2021
Data Sources	Historical Hudson accounting and operational records
Level of Assurance	Reasonable assurance
Definition of Materiality	Misstatements greater than five percent of the emission reductions assertion were considered material. Qualitative non-conformities with and discrepancies in the GHG Project Plan and Monitoring Report between the validation and verification criteria were also considered material.

The following outlines the guidance and protocols used to conduct the validation and verification:

Standards of Validation/Verification	<ul style="list-style-type: none">• ACR Standard, Version 7.0, December 2020 (ACR Standard)• Methodology for the Quantification, Monitoring, Reporting and Verification of the Greenhouse Gas Emissions Reductions and Removals from Certified Reclaimed HFC Refrigerants, Propellants, and Fire Suppressants, Version 2.0 (the Methodology), including Errata and Clarification issued May 5, 2022
Validation/Verification Process	<ul style="list-style-type: none">• ACR Validation and Verification Standard, Version 1.1, May 2018• ISO 14064-3: Specification with guidance for the validation and verification of greenhouse gas assertions, 2006

The GHG Project Plan—the final version of which is dated March 13, 2023—was also used to inform the verification process.

4. Project Description

The Project consists of the reclamation and reuse of HFCs from refrigeration and air conditioning equipment. Hudson Technologies Company (Hudson) acquires used refrigerants from multiple sources across the United States. Refrigerant gases included in the scope of the Project include:

- R-134a
- R-404a
- R-407a
- R-407c
- R-410a

Reclaimed refrigerants are sent to Hudson's EPA-certified reclamation facility in Smyrna, Georgia and processed for resale. The subsequent reuse of reclaimed refrigerants displaces virgin materials and results in a net reduction of HFC emissions.

Disposed aerosol products and fire suppressant materials are not included in the scope of the Project.

The GHG Project Plan provides additional details about the Project.

5. Overview of the Validation and Verification Process

To review the Project's GHG information, the following validation and verification process was used:

- conflict of interest review;
- selection of Audit Team;
- initial interaction and kickoff meeting with primary Hudson contacts;
- Site Visit;
- development of the validation/verification plans and sampling plan;
- review and evaluation of GHG information systems and data;

- follow-up interaction with Hudson contacts for corrective action or supplemental data as needed; and
- final statement and report development.

The process was utilized to gain an understanding of the Project's emission sources and reductions, to evaluate and verify the collection and handling of data, the calculations that lead to the results, and the means for reporting the associated data and results.

5.1 Conflict of Interest Review

Prior to beginning any third-party assessment, First Environment conducts an evaluation to identify any potential conflicts of interest associated with the engagement. No potential conflicts were found for the Project. A project-specific conflict of interest form was also filed with the ACR for the project.

5.2 Audit Team

First Environment's Audit Team consisted of the following individuals who were selected based on their validation and verification experience, as well as familiarity with industrial gas operations:

Team Leader – Michael Carim
Validation/Verification Team – Logan Simpson
Internal Reviewer – Jeff Daley

5.3 Audit Kick-off

The audit process was initiated with a kick-off meeting on November 8, 2022 with the primary Hudson contacts. The meeting focused on confirming the scope, schedule, and data required for validation and verification.

5.4 Development of the Validation & Verification Plans

The Audit Team formally documented the validation/verification plan as well as determined the data sampling plan. The validation/verification plan was informed by the kick-off meeting where key elements of the validation and verification scopes were discussed including project team members, project level of assurance, materiality threshold, and standards of reporting and evaluation. It also provided an outline of the validation and verification processes and established project deliverables. Hudson was afforded the opportunity to comment on the key elements of the plans for validation and verification. A separate data-sampling plan was designed to review all project elements in areas of potentially high risk of inaccuracy or non-conformance.

5.5 Site Visit

Mr. Michael Carim performed a site visit at the Hudson reclamation facility in Smyrna, Georgia on January 12, 2023 to assess GHG project boundaries, site operations, data collection processes, and information management systems, as well as to conduct interviews with key project personnel. During the site visit, First Environment conducted interviews with:

Jonathan Stack – Hudson Technologies
Ken Braer – Hudson Technologies
Ray Chandler – Hudson Technologies

5.6 Emissions Reduction Data and Calculation Assessment

This assessment used information and insights gained during the previous steps to evaluate the collected data and the reported emissions reduction quantities and identify if either contained material or immaterial misstatements.

5.7 Corrective Actions and Supplemental Information

The Audit Team made requests for corrective action during the validation and verification processes. Hudson provided sufficient responses to all requests. These requests and Hudson responses are described in Appendix A of this report.

5.8 Validation & Verification Reporting

Validation and verification reporting, represented by this report, documents the validation and verification processes and identifies their findings and results. Validation and verification reporting consist of this report for Hudson, along with a verification statement. Both the report and statement are submitted to ACR as part of the validation/verification reporting process.

6. Validation Results

6.1 Project Boundary

The Project boundary is defined as HFC emissions during manufacture or installation of equipment or system or product “First-Fill Emissions” (SSR 3), leaks during the operation of refrigeration or A/C equipment or system or product (SSR 4), servicing refrigeration or A/C equipment or system or product (SSR 5), and emissions from the disposal of the equipment at end-of-life (SSR 6). Fugitive emissions of virgin HFC material occurs in the baseline scenario during refrigeration or A/C equipment use and maintenance. Emission reductions occur from the reclamation and reuse of existing HFC material.

The Audit Team assessed the source, sink, and reservoir (SSR) determination included in the GHG Project Plan and found the justification accurate and in accordance with the Methodology.

Overall, Hudson provided an accurate description of the Project boundary and a comprehensive justification for the project SSRs.

6.2 Baseline Scenario

The baseline scenario is defined as the continued use of virgin refrigerant materials to charge new and existing refrigeration and A/C equipment. Hudson correctly selected the associated global warming potentials for baseline refrigerants that characterize the baseline scenario from Table 3 in the Methodology for the 2021 vintage year.

6.3 Emission reduction quantification methodologies and calculations

Emission reductions are quantified in accordance with the procedures described in the Methodology and the ACR Standard. The equations are correctly identified and the calculation of GHG emission reductions is presented in a transparent manner, incorporating all relevant GHG sources, sinks, and reservoirs.

Baseline emissions are quantified according to Equation 1 in the Methodology based on the quantity of eligible HFC sold during the reporting period.

No sources of project or leakage emissions are relevant under the Methodology.

Total net emission reductions are determined according to Equation 2 in the Methodology by setting total emission reductions during the reporting period equal to total baseline emissions.

After reviewing the quantification procedure and supporting evidence, the Audit team concluded that the methodologies have been applied correctly to calculate baseline emissions and net GHG emission reductions and removals.

6.4 Data Monitoring and Management System

The monitoring plan described within the GHG Project Plan includes all relevant data and parameters required to obtain a reliable result of generated emission reductions and meets the requirements of the Methodology. The primary variable monitored in order to determine and account for emission reductions is presented in Table 1 below.

TABLE 1: Monitoring Parameters

Monitoring Parameter	Method of Estimation	Frequency of Measurement	Unit of Measurement	Frequency of Recording
Total quantity of virgin HFC refrigerant j that would have been used to recharge equipment during the reporting period ($VR_{HFC,j,rp}$)	Sales invoices	As sold throughout reporting period	Kilograms	As sold throughout reporting period

The GHG Project Plan includes a complete description of the frequency, responsibility, and procedures for recording, storing, monitoring, and measuring all project data. All requirements in Section 5.1 of the Methodology are addressed by the monitoring plan contained with the GHG Project Plan.

The sections below discuss relevant aspects of the monitoring plan as they relate to the requirements for data collection and parameters to be Monitored in Section 5.2 of the Methodology.

6.4.1 Refrigerant Recovery

Used HFCs are recovered and then purchased by Hudson from customers throughout the United States. Cylinders filled with the recovered HFC are sent to the reclamation facility in Smyrna, Georgia. The cylinders arrive with a unique identification number and are logged by service technicians at the facility. Technicians log inbound shipment data including the type and origin of the HFC material, the cylinder and containers used to transport recovered HFCs, and its delivery to the reclamation facility. Shipment information and other associated recovery records are logged and retained in Hudson's financial accounting and data management systems.

All recovered refrigerants in the current Project, except for three transactions, are collected by service technicians or wholesales in individual containers of less than 500 lbs. gross refrigerant weight and delivered directly to the EPA-Certified reclamation facility, where they are aggregated for reclamation. Shipment information described is recorded in job and cylinder history reports which contain information including the name and location of the material recovery, cylinder serial number, gross and net weight, and the date of material receipt at the reclamation facility.

In the current Project, Hudson received two cylinders of R-407c and a single cylinder of R-410a consisting of 500 gross pounds or more of HFC material aggregated by wholesalers from smaller

recovery jobs. Hudson provided point of origin documentation for this transaction consistent with Section 5.2 of the methodology for material that was recovered by service technicians in individual containers of less than 500 pounds and aggregated with other recovered HFCs to greater than 500 pounds gross weight in an individual container prior to delivery to Hudson.

6.4.2 Refrigerant Reclamation

Hudson is an EPA-certified reclaimer.

Refrigerants are processed through Hudson's reclamation equipment and sent to bulk storage tanks on-site. Once full, samples are taken from the bulk tank and sent for analysis at Hudson's in-house lab. The lab was confirmed to be an AHRI-certified refrigerant testing laboratory. Certificates of analysis generated during laboratory analyses confirm that all testing is performed according to the AHRI-700 standard and that all reclaimed refrigerants in the project activity meet the definition of Certified Reclaimed Refrigerants. Certificates of analysis are matched to the reporting period based on bulk tank sizes and sales volumes to confirm the type and purity of the certified reclaimed HFC reported as sales.

6.4.3 Sale of Reclaimed Refrigerants

Sales of reclaimed refrigerants are tracked by Hudson's customer services and finance departments. An individual customer invoice documenting the type and net quantity of reclaimed refrigerant sold is generated for every transaction associated with the reporting period. Customer data stored in Hudson's financial system further confirms that all material is used in an eligible refrigerant sector and segment as defined by the Methodology.

The adequacy of the data management systems described in the monitoring plan was assessed during the site visit by reviewing data management system procedures and controls with Hudson personnel. All systems were determined to be capable of carrying out the specified monitoring tasks.

6.5 QA/QC Procedures

The GHG Project Plan includes QA/QC procedures for data that meet the requirements of the Methodology.

Hudson technicians weigh, log, and give each received cylinder a barcode to be tracked in Hudson's data management system. Hudson has multiple staff from various departments checking refrigerant types and weights that are entered. All entries into the system must be signed off by lab technicians and cylinders are checked against this data before reclamation. The Finance department is responsible for customer billing and reconciles all invoiced quantities internally. Sustainability staff collect all information required for GHG emission reduction reporting and perform data validation prior to submission for verification.

Further, all sales data used in emission reduction calculations serves as the basis for customer billing by Hudson and are subject to accounting controls and procedures, thereby providing an additional layer of quality assurance.

Due to the strong QA/QC and inventory tracking procedures surrounding recorded and reclaimed refrigerant quantities, minimal data uncertainty is foreseen.

6.6 Project-specific conformance to ACR eligibility criteria, including additionality

The Project meets the eligibility requirements set forth in the ACR Standard as described in Table 2 below.

TABLE 2: ACR Eligibility Criteria

Eligibility Requirement	Conformance Details	Validation Conclusion
Start Date	The start date is February 5, 2021	Consistent with requirement. The Project occurs at a reclamation facility visited during a successful validation and verification for another HFC reclamation project registered on ACR by Hudson ¹ . Per Errata #1 to the Methodology, validation must occur within three years of the project start date.
Minimum Project Term	N/A – project type does not contain risk of emission reduction reversal	N/A
Crediting Period	Fifteen years – February 5, 2021 through February 4, 2036	Consistent with requirement.
Real	HFC reclamation activities are performed in accordance with an approved ACR methodology to produce verifiable evidence of emissions mitigation.	Consistent with requirement.
Emission or Removal Origin	The project proponent reduces non-energy direct emissions by end users utilizing reclaimed HFCs.	Consistent with requirement.
Offset Title	Hudson retains rights to GHG emission reductions associated with the reclaimed HFC material through the terms and conditions agreed upon with its customers.	Consistent with requirement. Hudson retains ownership of emission reductions via contractual agreements with upstream and downstream customers.
Additional	Project satisfies additionality test in approved methodology and Regulatory Test in ACR Standard.	Project conforms to ACR additionality criteria. See Section 6.7 below for conformance details.
Regulatory Compliance	Reclamation facility was in compliance with regulatory requirements during the reporting period.	Hudson provided an attestation to First Environment to confirm regulatory compliance throughout the reporting period.
Permanent	N/A – project type does not contain risk of emission reduction reversal.	N/A
Net of Leakage	N/A – leakage does not apply under the Methodology	N/A
Independently Validated and Verified	Hudson contracted First Environment, Inc. to provide independent, trustworthy,	First Environment is an ANAB-accredited and ACR-approved validation/verification body.

¹ ACR648

Eligibility Requirement	Conformance Details	Validation Conclusion
	and objective third-party validation and verification services to the Project.	Audit activities were performed independently and in accordance with all ACR requirements.
Environmental & Community Assessments	No negative community or environmental impacts are identified. Net positive impact due to lower GHG emission and contributions to UN SDGs #9, #12, and #13.	Consistent with requirement. Project occurs at a private industrial facility. No negative external environmental or community impacts are created from the activity.

The Project activities comply with the applicability requirements of the Methodology. The table below lists the relevant applicability requirements and identifies how the Project meets them.

TABLE 3: Methodology Criteria

Eligibility Requirement	Conformance Details	Validation Conclusion
Location	The reclamation facility is located in Smyrna, GA. All refrigerant recovery occurs in the United States.	Consistent with requirement.
Sector/Segment	Hudson maintains customer profiles that confirm customers purchasing reclaimed refrigerants fall within an eligible Sector/Segment.	Consistent with requirement. Reclaimed refrigerants are used in the following Refrigerant Sectors from Table 1 in the Methodology: <ul style="list-style-type: none"> • Domestic Refrigeration • Commercial Refrigeration, also known as Retail Food Refrigeration • Industrial Process Refrigeration • Stationary Air Conditioning
Certified Reclaimed HFC Refrigerant	Reclaimed refrigerant Certificates of Analysis from Hudson.	Consistent with Requirement All reclaimed refrigerant analyses performed to AHRI-700 standard. Hudson Technologies Company is AHRI-accredited for refrigerant analysis

The Project has not participated in any other GHG emission trading or compliance programme nor has it been rejected by another GHG programme.

6.7 **Additionality**

The Project satisfies the requirements for the demonstration of additionality specified by the ACR Standard by passing an approved practice-based performance standard and a regulatory surplus test.

Certified reclaimed HFCs are used in eligible Refrigerant Sectors and Segments as defined by the Methodology; therefore, the Project satisfies the performance standard specified by the Methodology.

Additionally, Hudson provided a management attestation confirming that HFC reclamation activities were not mandated by law.

6.8 *Approved Variance or Deviations*

The Project did not obtain deviations from ACR during the validation/verification process.

7. Verification Results

During the verification process, First Environment reviewed the Project's Monitoring Report, GHG emission reduction assertions, and supporting documentation for the current reporting period to ensure consistency with the GHG Project Plan and the Methodology. Discrepancies between Project documentation and the verification criteria were considered material and identified for corrective action. Additionally, First Environment assessed the GHG emission reduction assertions and underlying monitored data to determine if either contained material or immaterial misstatements. The results of these reviews are discussed in greater detail below.

7.1 *GHG Information Verified*

Emission reduction calculations were reviewed to ensure accuracy in the formulas used and the raw data used as inputs. Formulae were tested to ensure they were consistent with the calculation methodology described in the Methodology and GHG Project Plan. Total baseline emissions were quantified in accordance with Equation 1 from the Methodology. The amount of HFC reclaimed and sold into the market ($VR_{HFC,j,rp}$) is determined from Hudson sales records during the reporting period. The reclaimed refrigerants GWPs ($GWP_{HFC,j}$) were determined from Table 3 in the Methodology. Total emission reductions were computed using Equation 2 from the Methodology. All emission sources within the project boundary are properly accounted for in calculations.

7.2 *Verification Assessment Techniques and Processes Employed*

Copies of the raw data used in the calculations, including the quantities of refrigerants recovered and sold, were compared with the data used in the final calculations and tested for transcription or mathematical errors. First Environment sampled all areas identified as being of high risk of inaccuracy, uncertainty, or misstatement and reviewed evidence such as laboratory Certificates of Analysis and performed other data checks in order to assess whether the project sufficiently mitigated data uncertainty. First Environment also performed reviews for a subsample of inbound material records, reclaimed refrigerant sales invoices, and customer refrigerant sector/segment information to inform the verification process and assess the robustness of Hudson's document management systems. The assessments performed on this data, as described above, confirmed the reliability of the evidence provided and verified the accuracy of the information flow. Additionally, First Environment performed recalculations of emission reductions for the entire reporting period to assess whether they were free of material misstatement. First Environment found the emission reduction calculations to be free of material misstatement.

The evidence provided was consistent with the requirements of the Methodology and the validated GHG Project Plan and meets generally accepted evidentiary standards for best practices in GHG accounting.

8. Audit Findings

Hudson provided good documentation for the emissions estimates as well as the procedures surrounding the data collection process. To complete the validation and verification processes, First Environment issued corrective action requests. Through communications with the Audit Team, Hudson was able to resolve all requests made by First Environment during the validation and verification processes.

The findings issued, as well as Hudson's responses, are summarized in Appendix A of this report.

9. Validation & Verification Conclusion

First Environment was retained to provide validation and verification services to Hudson for the Project's GHG emission reductions assertions based on the following fundamentals:

- *Level of assurance:* Reasonable assurance.
- *Validation/Verification objectives:* To assure project conformance with the validation/verification criteria and that the requirements of the ACR Validation and Verification Standard, Chapters 1.B and 8.B are met. Validation objectives also include an assessment of the likelihood that implementation of the Project will result in the emission reductions stated in the GHG Project Plan.
- *Validation/Verification criteria:* American Carbon Registry Standard, Version 7.0, December 2020; Methodology for the Quantification, Monitoring, Reporting and Verification of the Greenhouse Gas Emissions Reductions and Removals from Certified Reclaimed HFC Refrigerants, Version 2.0, including Errata and Clarification:
 - The verification process was also informed by the GHG Project Plan.
- *Definition of materiality:* Misstatements of greater than five percent of the GHG reduction assertion and qualitative non-conformities with validation and/or verification criteria are considered material.
- *Scope, including:*
 - *Boundaries of the assertion:* Hudson reclamation facility in Smyrna, GA.
 - *The physical infrastructure, facilities, and activities within the assertion:* Refrigerant reclamation equipment.
 - *GHG sources, sinks, and reservoirs included within the assertion:* Baseline emissions from the use of virgin HFCs in refrigeration or air conditioning equipment.
 - *The time period for the assertion:* February 5, 2021 to December 30, 2021.

Based on the assessments performed and the historical evidence collected, First Environment concludes that the GHG Project Plan is in conformance with the specified validation criteria and the Project GHG emissions reductions, due to the reclamation and resale of recovered HFC material for the below referenced time period, can be considered with a reasonable level of assurance:

- consistent with the GHG Project Plan,

- in conformance with the ACR Standard and the Methodology, and
- without material discrepancy.

Verified results show:

February 5 to December 30, 2021	Total
Baseline Emissions (tCO ₂ e)	292,094
Project Emissions (tCO ₂ e)	N/A
Emissions Reductions (tCO ₂ e)	292,094

10. Lead Verifier Signature



Michael M. Carim
Senior Associate

11. Independent Internal Reviewer Signature



Jeff Daley
Senior Associate

APPENDIX A – VALIDATION/VERIFICATION FINDINGS

ID	Corrective Action Request	Summary of Participant Response	VVB Conclusion
1	The entries in Section B4 of the Project Plan for GHG SSRs #4 and #6 are inconsistent with the SSR descriptions and/or included gases in the HFC Reclaim methodology.	The table in B4 of the Project Plan was revised for consistency with the HFC Reclaim Methodology SRR table.	Response is acceptable.
2	The GWPs applied in emission reduction calculations are inconsistent with the IPCC AR5 values and Table 3 in the HFC reclaim methodology. See Sections A7, E1, and E6 of the Project Plan as well.	Calculations were revised to employ the AR5 GWPs for 2021 emissions reduction reporting. Relevant sections of the Project Plan were also updated to resolve the issue.	Response is acceptable.
3	A6 in the Project Plan incorrectly references the R-22 refrigerant, which is outside the scope of the HFC Reclaim methodology.	A6 in the Project Plan was revised to remove references to R-22.	Response is acceptable.
4	<p>The Project Plan contains omissions or is inconsistent with the requirements of the ACR template in the following sections:</p> <ul style="list-style-type: none"> A7 does not describe the roles and responsibilities for the project proponent B3 does not describe the temporal boundaries of the project G1 is missing a link to the terms on the Hudson website and does not describe how Hudson retains offset title through standard terms of sale and See entry in offset title row in 'Proof of Project Eligibility' column in Table 1 as well Section H2 does not describe relevant project activities in each step of the GHG project cycle 	The Project Plan was revised to address all issues cited and become in conformance with the ACR Template requirements.	Response is acceptable.
5	The entries in the parameter box in Section V, 1 of the Monitoring Report for Methodology Section and Source of Data are incorrect relative to the monitored parameter.	The Methodology Section and Source of Data referenced in the monitoring box were revised to resolve the issue.	Response is acceptable.

ID	Corrective Action Request	Summary of Participant Response	VVB Conclusion
6	<p>The Monitoring Plan provided in Section V of the Monitoring Report does not address the following requirements from Section 5.1 of the HFC Reclaim methodology:</p> <ul style="list-style-type: none"> • Project implementation • Technical description of the monitoring task • Frequency of the monitoring • Quality control and quality assurance procedures • Organization and responsibilities of the parties involved 	<p>The Monitoring Plan as represented in Sections D of the Project Plan and V,2 of the Monitoring Report was revised to address all requirements from the HFC Reclaim Methodology.</p>	<p>Response is acceptable.</p>
7	<p>The Monitoring Report contains omissions or is inconsistent with the requirements of the ACR template in the following sections:</p> <ul style="list-style-type: none"> • Section III, 2 is filled in, however, the project is not a PDA Implementation. • Relative to Section V,2: <ul style="list-style-type: none"> ○ The description of the monitoring plan incorrectly states all data transfer is automated ○ The monitoring plan does not adequately describe methods used to track data ○ The monitoring plan does not adequately describe internal audit and/or QA/QC procedures for project data • Section VII, 1 does not include the date of the last verification site visit 	<p>The Monitoring Report was revised in the cited sections to resolve the referenced issues.</p>	<p>Response is acceptable.</p>

ID	Corrective Action Request	Summary of Participant Response	VVB Conclusion
8	Emission reduction totals are not rounded down to the nearest whole number	The revised emission reduction total is rounded down to the nearest whole number.	Response is acceptable.

ID	Clarification Request	Summary of Participant Response	VVB Conclusion
<i>No formal requests for clarification were issued during the validation/verification process.</i>			