

U.S. EPA'S ODS LAB INITIATIVE



Evaluating the continued need for the Montreal Protocol's Laboratory and Analytical ODS Uses Exemption

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Date

Dear Laboratory Customers,

As a Party to the *Montreal Protocol on Substances that Deplete the Ozone Layer* (the Protocol), the United States has made significant accomplishments by phasing out production of substances that destroy the stratospheric ozone layer. These ozone depleting substances (ODS) include carbon tetrachloride, bromochloromethane, methyl bromide, 1,1,1-trichloroethane (methyl chloroform), and other ODS that are used in small quantities in laboratories across the United States today. Your laboratory, like other U.S. laboratories, is permitted to purchase ODS in small quantities on an interim basis through periodic decisions made by the Parties to the Protocol. These decisions exempt ODS for essential laboratory and analytical (L&A) uses from the ban on production and import.

The most recent decision made by the Parties to the Protocol, in November 2009, extended the global L&A use exemption from December 31, 2010 until December 31, 2014. **Despite this extension, there is increasing international pressure to move laboratories away from using ozone-depleting substances. It is therefore possible that the laboratory exemption will not be extended past December 31, 2014.**

The Stratospheric Protection Division of the U.S. Environmental Protection Agency (EPA) is responsible for programs that protect the stratospheric ozone layer and for U.S. commitment obligations under the Protocol. To ensure that the United States is prepared for future negotiations with other Parties to the Protocol, EPA, with support from ICF International under EPA Contract Number EP-W-06-008, is engaging in an initiative to further understand laboratory practices that use ODS.

As a first step, EPA is seeking to simplify and more clearly categorize laboratory uses of ODS to ultimately improve the Laboratory Certification Report (EPA form #5900-152) that laboratories purchasing ODS are required to complete and submit to their suppliers. The proposed application categories are provided in Table 1 on the following page. As part of EPA's initiative, laboratory distributors are asking all of our customers to provide input to EPA on how you categorize your lab use of ODS by completing this table.

Please take a moment to complete the table and answer the questions that follow it and send via e-mail to ods-laboratoryuses@icfi.com. All information shared with EPA will be treated as confidential under the CBI provision of the Clean Air Act. EPA also welcomes your feedback on the proposed categorizations.

Instructions: Please indicate each ODS used for each of the L&A proposed categories and describe the L&A use for each. For the descriptions, please include: 1) Standards (e.g. ASTM, ASHRAE, ISO) associated with use; 2) type of research associated with use; 3) any other relevant information

Table 1: Proposed Laboratory & Analytical Use Categories

Proposed L&A Use Categories	ODS	Definition or Description of Relevant Procedures/Standards
Analytical Solvent Applications (e.g., solvent for chemical reaction, carrier solvent, extraction solvent)		
Equipment Calibration (e.g., reference standard)		
Other (please specify)		

Furthermore, EPA needs an improved understanding of the following:

- If your laboratory has a use for an ODS that does not have an alternative, what is it and what is the barrier to transitioning?
- If your laboratory has a use for an ODS that does have an alternative, why has your laboratory not switched to the alternative?

Your input will be used to argue for continued access to ODS beyond 2014 for L&A uses; EPA needs specific information from U.S. laboratories to defend your L&A uses of ODS in future international negotiations.

Over the course of this year and into the next, EPA will be actively engaging all relevant stakeholders in this initiative. To that end, EPA will hold a stakeholder conference in Washington D.C. in January 2011 with representatives from laboratories, suppliers, standards organizations, and other relevant parties. More information on this meeting will be provided as it becomes available.

Thank you for your time and attention.

Sincerely,

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Distributor Contact