CERTIFICATION LETTER

Background

A-Gas US Inc., at its Bowling Green, OH, facility, operates an argon arc plasma device for the destruction of refrigerants. In 2010 the operator of this device, Reclamation Technologies, Inc., doing business as RemTec International, engaged NSF-ISR to perform an audit for the purpose of expressing an opinion on whether the subject argon arc plasma device was a "qualifying destruction device" in accordance with criteria established by the Climate Action Reserve in its US and Article 5 ozone depleting substances project protocols. NSF-ISR conducted a third-party audit and issued its findings and opinion in an "NSF-ISR Verification Report to RemTec International" (12 January 2011, Job # J0163072). NSF-ISR concluded that RemTec International's argon arc plasma device was a qualifying destruction device and that RemTec International had met TEAP requirements relative to its testing and operation.

Objective of the Present Certification

A-Gas US Inc., the current owner of the argon arc plasma destruction device located at 1100 Haskins Road in Bowling Green, OH, has engaged NSF-ISR to certify that its device meets requirements for destruction facilities contained in the California Air Resources Board's Compliance Offset Protocol Ozone Depleting Projects adopted 20 October 2011. In that protocol, a "destruction facility" is defined as

> "A facility that destroys, transforms or converts ozone depleting substances using a technology that meets the standards defined by the UN Environment Programme Technology and Economic Assessment Panel Task Force on Destruction Technologies as provided in the *Report of the Task Force on Destruction Technologies* and listed in The Climate Action Reserve's *U.S. Ozone Depleting Substances Project Protocol Version 1.0*" (p. 39).

The protocol also states that:

> "Non-RCRA facilities must further document operation consistent with the TEAP requirements," and
> "A third party must certify that the non-RCRA facility meets the TEAP requirements (p. 33).

The objective for NSF-ISR's present engagement with A-Gas US Inc. is to provide the third-party certification that its operation of an argon arc plasma destruction device meets the requirements of Air Resources Board's Compliance Offset Protocol Ozone Depleting Projects section 6.6.

Scope of Engagement

NSF-ISR conducted this engagement as a partial verification of requirements of the Air Resources Board's Compliance Offset Protocol Ozone Depleting Projects, specifically those relating to the qualification of a destruction facility under section 6.6. The work is a partial verification because it was not conducted subsequent to the destruction of ozone depleting substances during a project reporting period.

Criteria for the Engagement

The criteria for this engagement are found in California Air Resources Board's Compliance Offset Protocol Ozone Depleting Projects adopted 20 October 2011. Additional criteria for this engagement are provided by § 95802 of the California Code of Regulations, Subchapter 10 Climate Change, Article 5 (September 1, 2012).

Level of Assurance

This engagement was conducted at the reasonable level of assurance as this term is defined in § 95802(387) of the California Code of Regulations. In this definition, ARB states that " 'Reasonable assurance' means a high degree of confidence that submitted data and statements are valid."

Threshold of Materiality, Definition of Nonconformance

Quantitative thresholds of materiality do not apply to this engagement. Section 98802(277) restricts the definition of "material misstatement" to "any discrepancy, omission, or misreporting, or aggregation of the three, identified in the course of verification services that leads a verification team to believe that the total reported covered emissions (metric tons of CO2e) or total reported covered product data contains errors greater than 5%, as applicable, in an emissions data report." Since the objective of this engagement is limited to the verification that the destruction device as operated meets TEAP requirements, evidence found to the contrary would constitute not a material misstatement but rather a "nonconformance" per § 95802(306). There the regulation states that " 'Nonconformance' means the failure to use the methods or emission factors specified in this article to calculate emissions, ***or the failure to meet any other requirements of the regulation"*** [emphasis added].

Conflict of Interest Evaluation

NSF-ISR completed an "Evaluation of Conflict of Interest for Offset Projects" form (ARB SSD/CCPEB #61 [12/12]) and submitted it to the Climate Action Reserve, an approved Offset Project Registry, for evaluation. NSF-ISR is accredited by the California ARB as a compliance offset credit verification body (credential # H2-12-009). After submitting the completed Conflict of Interest form to the Climate Action Reserve, NSF-ISR was informed that evaluation of potential conflicts of interest was not

required by the Offset Project Registry or by ARB. Nonetheless, NSF-ISR's self-determination was that its potential for conflict of interest was low.

Appointment and Qualifications of the Verification Team

NSF-ISR appointed John Shideler, PhD, as lead verifier for this engagement. Mr. Shideler is a Lead Verifier accredited by the California Air Resources Board for compliance offset protocol verification (credential # H2-12-145). In 2010 Mr. Shideler performed NSF-ISR's initial verification of RemTec International's operation of its argon arc plasma destruction device. He subsequently served as lead verifier for the early action offset credit project CAR883 in 2011-2012.

NSF-ISR appointed Sally Livingston as independent reviewer for this engagement. Ms. Livingston is a Lead Verifier accredited by the California Air Resources Board for compliance offset protocol verification (credential # H2-12-119). In 2011-12 Ms. Livingston served as lead verifier for the early action offset credit project CAR818.

Work Conducted

NSF-ISR's verification approach is risk-based. It draws upon our understanding of the potential for nonconformities to the requirements in ARB's compliance offset protocol and regulation, and the operation of controls to reduce such risks. Based upon a risk-based sampling plan, we have tested the assertion of A-Gas US Inc. that it continues to operate an argon arc plasma destruction device that meets the requirements of California ARB's Compliance Offset Protocol Ozone Depleting Substances adopted 20 October 2011.

We planned and performed our work to obtain all the information and explanations that we considered necessary to provide sufficient evidence for us to give reasonable assurance that A-Gas US Inc. continues to operate an argon arc plasma destruction device that meets the requirements of California ARB's Compliance Offset Protocol Ozone Depleting Substances adopted 20 October 2011.

Our Work Included:

- Verification that ownership of all of the shares issued and outstanding of Reclamation Technologies, Inc. (DBA RemTec International), an Ohio Corporation, were conveyed to A-Gas US Inc., a Delaware corporation, in a transaction dated 26 July 2012.
- Verification that key operational personnel previously employed by Reclamation Technologies, Inc., doing business as RemTec International, continued in the employ of A-Gas US Inc. up to the date of this verification engagement (2013-05-20).
- Confirmation from A-Gas US Inc. in Bowling Green, OH, that there has been no change in regulatory requirements related to air emissions or water discharges since NSF-ISR's last on-site project verification visit in June 2012.

- Confirmation from A-Gas US Inc. in Bowling Green, OH, that there has been no change in operating procedures that would adversely impact compliance with TEAP Code of Good Housekeeping guidelines since NSF-ISR's last on-site project verification visit in June 2012.
- Confirmation from A-Gas US Inc. in Bowling Green, OH, that there has been no significant change to the operational procedures relating to TEAP compliance since these were described by NSF-ISR in its "NSF-ISR Verification Report to RemTec International" dated 12 January 2011.
- Confirmation from A-Gas US Inc. in Bowling Green, OH, that to its knowledge and belief there has been no significant change to stack emissions from the argon arc plasma destruction device since the last Combustion Performance Test performed by Air Compliance Testing, Inc., of Cleveland, OH on 17-19 August 2010.
- Confirmation from A-Gas US Inc. in Bowling Green, OH, that to its knowledge and belief there has been no deterioration to the category of "deficient" of any element of its management system that was identified in section 3.6 of the "NSF-ISR Verification Report to RemTec International" dated 12 January 2011.

Conclusion

Based upon the above, NSF-ISR has concluded that A-Gas US Inc. continues to operate a "qualifying destruction facility" as this term is defined in the Air Resources Board's Compliance Offset Protocol Ozone Depleting Projects dated 20 October 2011, and that the facility remains in conformity with TEAP requirements.

Due to the TEAP requirement that destruction facilities obtain third-party emissions stack testing every three years with certification of emissions results, the third anniversary of which will occur in the third calendar quarter of 2013, the validity of this certification letter shall extend only to the date that NSF-ISR is able to recertify A-Gas US Inc.'s compliance with TEAP requirements subsequent to the next third-party emissions stack testing, or in any event, no later than 31 December 2013.

William Niedzwiecki

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William Niedzwiecki
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2013-05-22