



Submitted By: Peter Hessler

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This comment was received via email by the VCS Association.

To the secretariat of V-C-S :

The company URT (UNTHA Recyclingtechnik GmbH) are developing and manufacturing waste disposal plants for end of life cooling devices. These plants are operated by our customers worldwide. Therefore we are no plant operators. Our plants are designed according to the requirements of our customers. These requirements are mainly based on the individual legal regulations of the country concerned.

We expressly appreciate the project application of USG Umweltservice GmbH, Austria. When accepting deletion of ODS refrigerants and ODS blowing agents obtained from old cooling systems by means of VCS, a substantial contribution concerning climate protection can be made. This could be an impulse for professional waste disposal in such countries, in which the disposal of end of life cooling systems is neither regulated nor statutory.

We, however, are of the opinion, that the step for liquidation/condensation of blowing agents, as requested in the project application, will be not absolutely necessary. Furthermore this intermediate step (liquidation of blowing agents by active carbon adsorption or cryogenic-condensation) is too much restricting the possibilities of a professional disposal.

Especially in countries, in which the capacities of hazardous waste incinerators are not sufficient or incomplete, the destruction of blowing agents (CFCs) directly at the disposal plant of old cooling systems will be reasonable. Also in this case different possibilities of destruction will be possible.

There are already existing methods of cracking, on-line incineration or catalytic destruction. In these cases also an exact proof of destruction will be possible by measuring the individual ODS-substances.

Furthermore, as stated under point III “Monitoring Methodology”, on page 16 of this project application, it is requested that RAL has to fix for each country the quantity of recovery per cooling apparatus concerning blowing agents. This too, should be possible by other authority experts.

We hope that our comments will be taken into consideration when following up this application. For any further information please feel free to contact us.

We remain
with best regards

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