



June 3, 2010

Secretariat
VCS Association
1730 Rhode Island Avenue, NW
Suite 803
Washington, DC 20036

RE: *Greenhouse Gas Emission Reductions by Recovering and Destroying Ozone Depleting Substances (ODS) from Products*

Thank you for the opportunity to submit comments on the methodology *Greenhouse Gas Emission Reductions by Recovering and Destroying Ozone Depleting Substances (ODS) from Products*. I appreciate the efforts of Energy Changes Projekt Entwicklung GmbH and USG Umweltservice GmbH in drafting this document for review.

Appliance Recycling Centers of America, Inc. (ARCA) is one of the largest recyclers of major household appliances in North America. As such, we have considerable experience and interest in the proper management of CFC/HCFC/HFC refrigerants and blowing agents in the polyurethane insulating foam of refrigeration appliances and associated VCS offsets. We are also the exclusive North American distributor of UNTHA Recycling Technology (URT), one of Europe's leading manufacturers of technologically advanced refrigerator recycling systems.

After careful review of the document, I would respectfully suggest two areas of additional consideration for incorporation into the proposed methodology:

1. Because technology to manage refrigeration appliances at end of life has advanced to the point that methods now exist to directly incinerate airstreams containing CFCs generated during the appliance demanufacturing process, there is no longer a need to condensate blowing agents from the airstream for quantification and destruction in every situation. With the new technology, incineration of CFCs in the ambient air is accomplished during the CFC extraction process, eliminating the extra step of condensation to collect liquid CFCs for destruction. With a direct incineration process, the assumption is that all CFCs

released from the appliance are destroyed in a controlled environment without requiring the transfer of the substance into another physical state.

2. Page 16 of the draft methodology indicates that “For each host country RAL will publish the quantities of blowing agents to be recovered.” While the RAL is a well-respected organization in the field of ODS management, we suggest that other qualified organizations and experts also have the opportunity to participate and perform similar functions related to this proposed methodology.

Again, thank you for the opportunity to comment on the draft methodology and for all of the effort the VCS has contributed to setting a new standard and program for credible voluntary carbon offsets. I look forward to seeing the next version of the methodology.

Sincerely,

A handwritten signature in black ink that reads "Jack Cameron". The signature is written in a cursive, flowing style.

Edward R. (Jack) Cameron, President
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