



**United Nations  
Environment  
Programme**

Distr.  
GENERAL

UNEP/OzL.Pro/ExCom/73/41  
10 October 2014

ORIGINAL: ENGLISH



---

EXECUTIVE COMMITTEE OF  
THE MULTILATERAL FUND FOR THE  
IMPLEMENTATION OF THE MONTREAL PROTOCOL  
Seventy-third Meeting  
Paris, 9-13 November 2014

**PROJECT PROPOSAL: LEBANON**

This document consists of the comments and recommendation of the Fund Secretariat on the following project proposal:

Destruction

- Pilot demonstration project on ODS waste management and disposal

UNIDO

**PROJECT EVALUATION SHEET – NON-MULTI-YEAR PROJECT**

**LEBANON**

**PROJECT TITLE**

**IMPLEMENTING AGENCY**

Pilot demonstration project on ODS waste management and disposal

UNIDO

**NATIONAL COORDINATING AGENCY:** National Ozone Unit of Lebanon

**LATEST REPORTED CONSUMPTION DATA FOR ODS ADDRESSED IN PROJECT**

**A: ARTICLE-7 DATA (ODP TONNES in 2013)**

Annex I, CFC	0		

**B: COUNTRY PROGRAMME SECTORAL DATA (ODP TONNES, 2013)**

ODS	Subsector/quantity	Subsector/quantity	Totals
CFC			0

**CURRENT YEAR BUSINESS PLAN:** Total funding US \$163,500. Total phase-out 14ODP tonnes

**PROJECT TITLE**

ODS use at enterprise			n/a
ODS to be phase-out			n/a
ODS phased in			n/a
Project in current business plan			Yes
Sector			ODS destruction
Sub-sector			Refrigeration and air-conditioning sub-sector
Project impact			12.7 tonnes
Project duration			18 months
Local ownership			100%
Export component			0%
Original requested amount			147,733
Requested MLF grant			
	UNIDO	US \$	123,475
	Total	US \$	123,475
Implementing agency support cost			
	UNIDO (9%)	US \$	11,113
	Total	US \$	11,113
Total cost of project to MLF		US \$	<b>134,588</b>
Cost-effectiveness		US \$/kg metric	9.69
Project monitoring milestones			Included

**SECRETARIAT'S RECOMMENDATION:**

Individual consideration

## PROJECT DESCRIPTION

1. At the 72<sup>nd</sup> meeting, on behalf of the Government of Lebanon, UNIDO submitted a proposal for a pilot demonstration project on ozone depleting substances (ODS) waste management and disposal at the amount of US \$173,353, plus agency support costs of US \$15,602 for UNIDO, as originally submitted<sup>1</sup>. Prior to the 72<sup>nd</sup> meeting, UNIDO withdrew the submission at the request of the Secretariat as the proposal had not met some of the criteria in decision 58/19.

2. The Executive Committee agreed that the project could be re-submitted on an exceptional basis to the 73<sup>rd</sup> meeting, on the condition that it fully met the guidelines in decision 58/19, and that it would consider export for destruction as an option for the project (decision 72/21).

3. Subsequently UNIDO re-submitted the proposal at the amount of US \$147,733, plus agency support costs of US \$13,296. The project will address the destruction of 12.7 metric tonnes (mt) of ODS waste over an 18-month period. The project proposal is attached as Annex I to this document.

### Project description

4. The pilot project seeks to develop a sustainable strategy to destroy stocks of unwanted ODS in Lebanon. The approaches considered for destruction of ODS included: (1) destruction at a designated ODS incineration plant; (2) destruction through co-incineration with other waste; (3) destruction in a retrofitted cement kiln; (4) destruction through plasma technologies; (5) destruction through non-incineration technologies; and (6) export for destruction.

5. During project preparation, the various strategies listed above were discussed and assessed. To ensure long-term sustainability of the project beyond implementation, retrofitting of a cement kiln in Lebanon to build its national capacity for ODS destruction was the option that was first considered. However, the lack of commitment from the cement kiln owner and the associated regulatory issues made this option difficult to implement. The other most feasible option assessed was to transport the unwanted ODS to a destruction facility in Europe.

6. The demonstration project will also seek to reinforce and connect the existing collection network with the destruction process to be established. The strategy of export of ODS wastes can thus be applied as a long-term method for the country to destroy future stocks of unwanted ODS.

### *Estimate of ODS waste to be disposed*

7. This pilot project will address 12.7 mt of ODS waste for destruction, consisting of CFC stocks, collected by servicing workshops, training centres, end users and importers as shown in Table 1. These have been confirmed through a series of on-site data collection exercises carried out by a national consulting team. Some stock of halon (1.8 mt) has also been identified, but this will not be exported for destruction. A disposal strategy for halon will be prepared separately as part of the project.

**Table 1: Total quantities of ODS waste available for disposal in Lebanon**

Sector	CFC-12/kg	CFC-11/kg	R-502/kg	R-500/kg	Total/kg
Service workshops	2.57	1.25	0.04	0	3.86
Training centres	0.73	0	0	0	0.73
Hotels	0.23	0	0.03	0.01	0.27
Hospitals	0.30	0	0	0	0.30
Malls and supermarkets	0.01	0	0	0	0.01
Cold rooms	1.19	0	0	0	1.19

<sup>1</sup> At the 61<sup>st</sup> meeting, the Executive Committee provided funds for UNIDO to prepare a pilot ODS disposal demonstration project for Lebanon.

Importers	5.54	0.82	0	0	6.36
Lebanese Army*	0	0	0	0	0
<b>TOTAL</b>	<b>10.57</b>	<b>2.07</b>	<b>0.07</b>	<b>0.01</b>	<b>12.72*</b>

\* plus 1.8 mt halon to be treated in the halon disposal strategy.

8. Lebanon currently lacks an institutional nation-wide collection system for ODS waste despite the existing law requiring recovery, recycling, reclamation and destruction of ODS waste. Collection activities are currently being undertaken by various stakeholders working in different sectors. Efforts are being made for such a system to be put in place as part of this project.

#### *Project activities*

9. The following activities will be implemented under the project: establishment of aggregation facilities in Tripoli and Beirut; aggregation of ODS waste and quality testing for export; identification of a destruction facility in Europe in line with a public bidding process required both by the Government and UNIDO; transportation of the ODS waste stocks to the selected destruction facility; destruction and verification of destroyed ODS stocks and reporting.

#### Sustainability of the project

10. The following have been identified as the elements that would contribute to the sustainability of the ODS disposal project:

- (a) Strengthening the enforcement of existing legislation related to ODS waste collection and disposal. Implementation of the project would create the adequate enabling environment to enforce mandatory collection and destruction of ODS wastes;
- (b) Stakeholder engagement to ensure a cooperative environment in setting up an ODS disposal infrastructure in the country; and
- (c) Encouraging the collection of old ODS waste for destruction through lessons learned from this project.

#### Financial management of the project

11. Funding from the Multilateral Fund (US \$147,733) will cover the project activities described in paragraph 10 above including the operation of the pilot project for two years as shown in Table 2. Co-financing (US \$37,200) will be provided in-kind.

**Table 2: Proposed cost of the project**

Item	Cost (US\$)		
	MLF	Co-financing	Total
Transportation of 12.7 mt of CFCs from different centers to aggregation points	11,000	21,450	32,450
Substance and impurity testing, oil removal where necessary, decanting of cylinders into ISO containers, labelling, documentation	28,100	15,750	43,850
Shipment and transportation of ISO tanks including insurance and tracking system (total transport at \$1.50/kg)	19,050	0	19,050
Destruction (purification and testing at destruction site at \$1.00/kg; destruction at \$5.00/kg)	63,500	0	63,500
Contingency (5%)	6,083	0	6,083

Policy support; project management unit (PMU)	15,000	0	15,000
Halon disposal strategy	5,000	0	5,000
<b>TOTAL (US\$)</b>	<b>147,733</b>	<b>37,200</b>	<b>184,933</b>

#### Monitoring and verification of the destruction

12. The process will be closely monitored and data will be recorded by the project management unit. Valid assurances and certification will be provided so that the 12.7 mt of ODS will actually be destroyed. UNIDO will issue a certification of destruction at the close of the project.

### **SECRETARIAT'S COMMENTS AND RECOMMENDATION**

#### **COMMENTS**

13. The Secretariat reviewed the project based on the interim guidelines for the funding of demonstration projects for the disposal of ODS established in decision 58/19. It also took into account decision 72/21 in which the Executive Committee agreed that this project may be resubmitted for consideration, with specific conditions.

14. With regard to its compliance with decision 58/19, UNIDO reiterated that collection activities will not be part of the project, and that while an institutionalized system of collecting ODS waste is lacking, there is an existing system that has resulted in the accumulation of the ODS waste that is included in this project. UNIDO reiterated the Government's commitment to use lessons learnt from this project and formalize a collection system as part of the demonstration project.

15. In explaining how the collection system works, UNIDO clarified that the 12.7 mt of ODS waste have been identified based on a survey of various sources of ODS waste. There is as yet no institutional system for waste collection, and that the collection of these unwanted ODS is being undertaken by various stakeholders working in different sectors. While the country does have a policy to recover and recycle ODS, and that under the national phase-out plan (NPP) recovery and recycling centres were established, these are not fully operational at the present time. However, several service workshops do collect ODS waste from servicing operations which are being kept in cylinders for future disposal. A comprehensive collection system is expected to be established when the project is completed. The Secretariat noted that based on the additional information provided, the project met the guidelines contained in decision 58/19.

16. In addressing issues related to the selected option of export for destruction, UNIDO indicated that as a more cost-effective option, the preferred destination is Europe due to lower transportation costs from Lebanon as compared to transport costs to the United States of America. However, it was not possible to identify a specific destruction facility where the waste will be transported to as it intends to select this through an open bidding process, taking into account the requirements of UNEP Technology and Economic Assessment Panel (TEAP)<sup>2</sup> for ODS destruction and removal efficiency exceeding 99.99 per cent. UNIDO reported that the selection criteria will be based on whether the facility, is in compliance with the technologies approved by TEAP; meets the performance and emissions requirements set out by TEAP; and is a registered the European Union (EU)<sup>3</sup> facility.

17. UNIDO also mentioned that the Government of Lebanon may, in future pursue the option of developing national capacity for ODS destruction as a long term sustainable option when regulatory

<sup>2</sup> TEAP - Report of the Task Force on Destruction Technologies: [http://ozone.unep.org/teap/Reports/Other\\_Task\\_Force/index.shtml](http://ozone.unep.org/teap/Reports/Other_Task_Force/index.shtml)

<sup>3</sup> As an EU registered facility, its destruction technologies have to be included in the Annex of Regulation (EC) No. 1005/2009 of the European Parliament and of the Council of 16 September 2009 on Substances that Deplete the Ozone Layer.

support is in place, and where private cement kilns would agree to cover co-financing costs for such a venture. This would be established privately and at no cost to the Multilateral Fund.

18. UNIDO further reported that the experience from the project may facilitate access to carbon markets when better opportunities for these markets arise. It did reiterate however, that the project will not engage in these transactions at the current time, but will include a stronger mechanism for monitoring and verification that would enable access to carbon markets in the future.

19. The Secretariat and UNIDO discussed the funding requested for the project, resulting in adjustments to the costs related to testing, policy support and the removal of the halon disposal strategy. The table below presents the revised budget for the project, as adjusted.

**Table 3: Final agreed cost of the project**

Item	Cost (USD)		
	MLF	Co-financing	Total
Transportation of 12.7 mt of CFCs from different centers to aggregation points	8,000	24,450	32,450
Substance and impurity testing, oil removal where necessary, decanting of cylinders into ISO containers. labelling, documentation)	21,925	21,925	43,850
Shipment of ISO tanks, including insurance and tracking system; (total transport at \$1.50/kg)	19,050	0	19,050
Destruction (purification and testing at destruction site at \$1.00/kg; Destruction at \$5.00/kg)	63,500	0	63,500
Contingency (5%)	3,500	0	3,500
Policy support; Project management unit (PMU)	7,500	7,500	15,000
Halon disposal strategy	0	5,000	5,000
<b>TOTAL (US\$)</b>	<b>123,475</b>	<b>58,875</b>	<b>182,350</b>

20. The final cost of the project was agreed at US \$123,475 (plus agency support costs of US \$11,113) calculated at US \$9.69/kg which is lower than the threshold (US\$13.2/kg).

## RECOMMENDATION

21. The Executive Committee may wish to consider:

- (a) Noting the submission of the Government of Lebanon of a pilot ODS waste management and disposal project;
- (b) Approving the implementation of a pilot demonstration project for ODS waste management and disposal in Lebanon to destroy a total of 12.7 metric tonnes of ODS waste, at the amount of US \$123,475 plus agency support costs of US \$11,113 for UNIDO, on the understanding that:
  - (i) No further funds would be available for Lebanon for any ODS disposal projects in future;
  - (ii) Any marketing of greenhouse gas (GHG) emission reductions that may be generated by or associated with the project would be subject to a decision by the Executive Committee; and
- (c) Requesting the Government of Lebanon, through UNIDO, to establish a monitoring system for the operation of, and the activities associated with, the ODS waste management and disposal demonstration project; and

- (d) Requesting UNIDO to report thereon to the Executive Committee at the completion of the project in 2016, ensuring that no marketing of GHG emission reductions had taken place.

----





<b>MULTILATERAL FUND FOR THE IMPLEMENTATION OF THE MONTREAL PROTOCOL ON SUBSTANCES THAT DEplete THE OZONE LAYER</b>			
<b>PROJECT COVER SHEET</b>			
<b>COUNTRY</b>	Lebanon	<b>IMPLEMENTING AGENCIES</b>	UNIDO
<b>PROJECT TITLE</b>	Pilot Demonstration Project on ODS Waste Management and Disposal		
<b>PROJECT IN CURRENT BUSINESS PROGRAMME</b>	Yes		
<b>SECTOR</b>	ODS destruction		
<b>SUB-SECTORS</b>	Refrigeration and Air Conditioning sub-sector		
<b>ODS DESTROYED</b>	R11	2.07	Metric tonnes
	R12	10.59	Metric tonnes
	R500	0.01	Metric tonnes
	R502	0.07	Metric tonnes
	Total	12.74	Metric tonnes
		12.68	ODP tonnes
<b>PROJECT IMPACT</b>	Net ODP value per annum	6.34	ODP tonnes
	Annual emissions (CO <sub>2</sub> equivalent)	16,875	tonnes CO <sub>2</sub> e
<b>PROJECT DURATION</b>	– Demonstration Project		18 months
<b>PROJECT COSTS</b>	Incremental Capital Costs	US\$	158,850
	Contingencies	US\$	3,500
	Incremental Operating Costs	US\$	-
	Policy and Management Support	US\$	15,000
	Total Project Costs	US\$	182,350
<b>LOCAL OWNERSHIP</b>			100%
<b>EXPORT COMPONENT</b>			0%
<b>REQUESTED MLF GRANT</b>	UNIDO	US\$	123,475
	TOTAL	US\$	123,475
<b>COST EFFECTIVENESS (Destruction of CFCs)</b>			US\$/kg 9.69
<b>SUPPORT COSTS</b>	UNIDO (9%)	US\$	11,113
<b>TOTAL COST OF PROJECT TO THE MULTILATERAL FUND</b>			US\$ 132,118
<b>STATUS OF COUNTERPART FUNDING</b>	Confirmed		
<b>PROJECT MONITORING MILESTONES (Y/N)</b>	Y		
<b>NATIONAL COORDINATING BODIES</b>	National Ozone Unit of Lebanon		

**Project summary:**

UNIDO, on behalf of the Government of Lebanon, submitted the project document “Pilot Demonstration Project on ODS Waste Management and Disposal in Lebanon” to the 72<sup>nd</sup> Meeting of the Executive Committee of the Multilateral Fund for the Implementation of the Montreal Protocol. In response to the decision of the ExCom, the project is being resubmitted to include an alternative strategy for ODS destruction abroad.

The **main objective of the project** is to develop a sustainable strategy to destroy stocks of unwanted ODS in Lebanon. The original strategy looked into the establishment of local destruction capacity for the disposal of ODS waste and other chemical waste in Lebanon, which can be used by other countries in the region. The alternate, and preferred strategy looks into the feasibility of exporting ODS for destruction.

To ensure efficient implementation of the project, a total of **14.54 metric tonnes of ODS waste** will be disposed of over a period of 18 months. This amount of ODS waste has already been collected from various sectors at different locations across the country. The amount of ODS waste to be destroyed is distributed as follows:

- 2.07 metric tonnes of R11;
- 10.59 metric tonnes of R12;
- 0.01 metric tonnes of R500;
- 0.07 metric tonnes of R502;
- 1.80 metric tonnes of halons.

During project preparation, various strategies were discussed and assessed by relevant stakeholders in the country and UNIDO. In order to ensure sustainability of the project beyond implementation of the MLF-funded project, the **chosen project strategy** involves the export of old ODS stock for destruction abroad.

The implementation of this project will contribute to the **long-term sustainability of ODS destruction activities** in Lebanon by contributing to such sustainability from a variety of angles, namely:

- Introduction and effective enforcement of legislation addressing ODS disposal; implementation of the project would contribute to create the adequate enabling environment to enforce the obligation to destroy ODS waste;
- A thorough stakeholder engagement process will be undertaken in order to ensure a cooperative environment in the setting up of an ODS disposal infrastructure in the country;
- The strategy for export of ODS can be applied as a long-term method for the country to destroy its future unwanted stockpiles of ODS
- Implementation of the project and related lessons learned will contribute to encourage the collection of old ODS for destruction.

**PREPARED BY** International Experts (Environment Management Company) **DATE** 9 Sept. 2014  
National Ozone Unit, Ministry of Environment  
UNIDO

## **Project Document**

**Ministry of Environment**

**Republic of Lebanon**

**United Nations Industrial Development Organization**

# **Pilot Demonstration Project on ODS Waste Management and Disposal**

**September 2014**

## TABLE OF CONTENTS

<b>INTRODUCTION.....</b>	<b>1</b>
<b>1. COMPLIANCE OF THE PROJECT CONCEPT WITH THE FUNDING GUIDELINES (DECISION 58/19).....</b>	<b>2</b>
<b>2. BACKGROUND .....</b>	<b>5</b>
2.1. Ratification of Amendments to the Montreal Protocol.....	5
2.2. ODS Consumption in Lebanon.....	5
2.3. Stakeholders in ODS Activities in Lebanon.....	7
2.4. ODS- & Waste-Related Legislation .....	7
2.4.1. Literature Review .....	7
2.5. CFC and HCFC Phase-Out Programmes.....	8
2.6. Sources and Collection of ODS Waste.....	8
2.6.1. Manufacturing Sector .....	9
2.6.2. Servicing Sector and end-users.....	9
2.6.3. Importers.....	12
2.6.4. Waste Disposal Center.....	13
2.7. Disposal Programmes for Other Chemicals .....	13
<b>3. PROJECT OBJECTIVES.....</b>	<b>13</b>
<b>4. PROJECT SCOPE.....</b>	<b>14</b>
4.1. CFC Banks.....	14
4.2. Halon Banks.....	15
4.3. Total Amount of ODS Waste for Disposal in the Project .....	15
<b>5. PROJECT STRATEGY .....</b>	<b>15</b>
<b>6. PROJECT IMPLEMENTATION.....</b>	<b>16</b>
6.1. Exportation of ODS for destruction in a facility abroad.....	16
6.1.1. Quality testing and aggregation of ODS for export.....	17
6.1.2. Transportation of the ODS stocks.....	17
6.1.3. Destruction .....	18
6.1.4. Verification of destroyed ODS amounts and reporting .....	18
6.2. Policy Support .....	18
6.3. Project Management and Implementation Schedule .....	19
<b>7. PROJECT SUSTAINABILITY AND DEMONSTRATION VALUE.....</b>	<b>22</b>
<b>8. PROJECT BUDGET .....</b>	<b>23</b>
8.1. Total Budget - Export of Unwanted ODS for Destruction Abroad .....	23
8.2. Project Co-Financing .....	23

<b>ANNEXES .....</b>	<b>24</b>
Annex I: Management of Chemicals in Lebanon.....	24
Main Findings .....	28
Annex II: ODS Stock of Refrigeration and A/C Service Workshops .....	30
Annex III: ODS Stock of National Training Centers .....	32
Annex IV: ODS Stock of Large End-users .....	33
Annex V: ODS Stock of Importers of Industrial Gases .....	34
Annex VI: Development of a Strategy for Local ODS Destruction .....	35
Establishment of a Local Destruction Facility .....	36
I)    Modification of the Cement Kiln.....	36
II)   Pilot Testing.....	37
Approach.....	37
Technical Aspects of the Pilot Tests .....	37
III)  Quality Testing and Aggregation.....	38
IV)  Transportation of the ODS stocks to the cement kiln .....	39
V)   Destruction .....	40
Description of the Destruction Facility .....	40
Operational Details during Destruction Activities .....	41
VI)  Verification of Destroyed ODS Amounts and Reporting.....	42
Implementation Schedule for ODS Destruction in Lebanon .....	44
Total Budget for ODS Destruction in Lebanon .....	45

## INTRODUCTION

---

The Executive Committee, at its 61<sup>st</sup> meeting, provided funds to prepare a pilot demonstration project on ODS waste management and disposal in Lebanon, to be developed in line with the criteria and guidelines for the selection of ODS disposal projects as reflected in Decision 58/19.

The project document has been prepared by national and international experts coordinated by UNIDO, in cooperation with the National Ozone Unit/Ministry of Environment of Lebanon. During the preparatory phase of the project, on-site visits were organized to collect data on available ODS stocks and identify possible destruction methods, and several stakeholder meetings were organized by the NOU and UNIDO.

As a result of this process UNIDO, on behalf of the Government of Lebanon, submitted the project document “Pilot Demonstration Project on ODS Waste Management and Disposal in Lebanon” to the 72nd Meeting of the Executive Committee of the Multilateral Fund for the Implementation of the Montreal Protocol. In response to the decision of the ExCom, the project is being resubmitted to include an alternative strategy for ODS destruction abroad.

The main objective of the project is to develop a sustainable strategy to destroy stocks of unwanted ODS in Lebanon. The original strategy focused on the establishment of a local destruction capacity for the disposal of ODS waste and other chemical waste in Lebanon. The preferred alternate strategy is for destruction to take place abroad. For both strategies, the necessary logistical infrastructure will be set in place, and both technical and human resources will be reinforced to facilitate ODS waste management at country level.

To ensure efficient implementation of the project, a total of 14.54 metric tonnes of ODS waste will be disposed of over a period of 18 months. The amount of ODS waste to be destroyed is distributed as follows:

- 2.07 metric tonnes of R11;
- 10.59 metric tonnes of R12;
- 0.01 metric tonnes of R500;
- 0.07 metric tonnes of R502;
- 1.80 metric tonnes of halons.

All ODS stocks identified for destruction under this project have been collected by servicing workshops, training centres, end users and importers. These stocks are related to their use in home appliances and commercial refrigeration equipment. Manufacturing companies (in the commercial and domestic refrigeration, foam and aerosol sectors) have undertaken conversion activities and do not hold any unwanted stocks of ODS. Unwanted Halon stocks will not be destroyed under this project but a strategy for its one-time destruction abroad will be devised.

In addition to the main project activities, the project will introduce and contribute to the effective enforcement of legislation addressing ODS disposal. Implementation of the project would contribute to create the adequate enabling environment to enforce laws dictating the obligation to destroy ODS waste.

## 1. COMPLIANCE OF THE PROJECT CONCEPT WITH THE FUNDING GUIDELINES (DECISION 58/19)

---

The Executive Committee, at its 58th Meeting, approved a set of interim guidelines for the funding of demonstration projects for the disposal of ODS in accordance with paragraph 2 of decision XX/7 of the Meeting of the Parties. The following information is provided to show the project's compliance with all the requirements as set out by the above mentioned Decision 58/19.

### a) Updated and more detailed information for all issues mentioned under project preparation funding

- i. *An indication of the category or categories of activities for the disposal of ODS (collection, transport, storage, destruction), which will be included in the project proposal.*

The project includes the following categories of activities for the disposal of ODS: transport, storage and destruction. The project takes advantage of the various ongoing collection activities in Lebanon; however it only seeks funding from the MLF for the three activities above in line with the interim guidelines for the funding of demonstration projects for the disposal of ODS.

A detailed description of the activities to be undertaken during project implementation can be found in Section 6 of this project document.

- ii. *An indication of whether disposal programmes for chemicals related to other multilateral environmental agreements are presently ongoing in the country or planned for the near future, and whether synergies would be possible.*

Lebanon is currently implementing various programmes on POPs management in the framework of its obligations under the Stockholm Convention. In 2006, a project was launched to demonstrate and promote Best Techniques and Practices to reduce health-care waste and to avoid environmental releases of dioxins and mercury. This will be implemented through the establishment of model facilities and programmes. Another project was submitted to the GEF in June 2014 aimed at improving the management of PCBs and its disposal in an environmentally sound manner.

There are opportunities for synergies in terms of ODS waste management and disposal in the future.

- iii. *An estimate of the amount of each ODS that is meant to be handled within the project.*

Implementation of the project will allow for the destruction of 12.73 metric tonnes of CFC waste, distributed as follows:

- 2.07 metric tonnes of R11;
- 10.59 metric tonnes of R12;

- 0.01 metric tonnes of R500;
- 0.07 metric tonnes of R502;

For the 1.80 metric tonnes of halons, a strategy to destroy these stocks will be developed under this project.

A detailed break-down of these amounts and the location of the related stocks can be found in Section 2.6 and the Annexes II to V of this project document.

- iv. *The basis for the amount of ODS; this figure should be based on known existing stocks already collected [...]¹.*

The total amount of ODS waste considered for destruction in the context of this project has already been identified through the various ongoing collection efforts, according to the definitions in Annex VIII to the report of the 58<sup>th</sup> Meeting of the Executive Committee. These amounts have been confirmed through a series of data collection exercises. A national consulting team recruited by UNIDO has undertaken on-site data confirmation.

- v. *For collection activities, information regarding existing or near-future, credible collection efforts and programmes that are at an advanced stage of being set up and to which activities under this project would relate.*

Since no collection activities are intended to arrive at the amounts covered by this project proposal, this particular part of the decision is not relevant for the assessment of this particular proposal. However, in order to inform about the situation in the country, the available information on on-going ODS waste collection activities in Lebanon has been compiled and can be found in Section 2.6 of this project document.

- vi. *For activities that focus at least partially on CTC or halon, an explanation of how this project might have an important demonstration value*

Unwanted halon stocks have been identified under this project. The project aims to develop a strategy for a one-time export and destruction of halons.

---

<sup>1</sup> Remainder of decision paragraph “, or collection efforts already at a very advanced and well-documented stage of being set up” not relevant since stocks are already existing and confirmed.



**b) Specific information required for project submissions**

*i. A detailed description of the foreseen management and financial set up.*

**Table 1.1: Export for destruction abroad**

Item	Cost (USD)		
	MLF	Co-financing	Total
Transportation of 12.7 metric tonnes of CFCs from different centers to aggregation points	8,000	24,450	32,450
Substance and impurity testing, oil removal where necessary, decanting of cylinders into ISO containers, labelling and documentation.	21,925	21,925	43,850
Shipment of ISO tanks for export to another country, including insurance and GPS tracking system; Transportation inland from port to destruction facility. (Total transport @ \$1.5/kg)	19,050	0	19,050
Destruction (Purification and testing at destruction site @ \$1/kg; Destruction @ \$5/kg)	63,500	0	63,500
Contingency	3,500	0	3,500
Policy support; PMU	7,500	7,500	15,000
Halon disposal strategy	0	5,000	5,000
<b>TOTAL (USD)</b>	<b>123,475</b>	<b>58,875</b>	<b>182,350</b>

The following table shows the break-down of funding requested to the Multilateral Fund:

**Table 1.2: Project Funding under the Multilateral Fund**

Cost Item	Cost (USD)
<b>Project funding requested to the Multilateral Fund</b>	<b>123,475</b>
<b>Project support costs</b>	<b>8,643</b>
<b>Total requested from the Multilateral Fund</b>	<b>132,118</b>

The project funding requested from the Multilateral Fund for the destruction of CFCs (12,733.2kg) is USD 123,475 (excluding support costs), with a total cost efficiency of **9.69 USD/kg** of ODS waste.

*ii. A clear indication how the project will secure other sources of funding.*

Section 8.2 of this project document provides information on the total amount of co-financing secured for this project..

*iii. A concept for monitoring the origin of recovered ODS for future destruction, with the objective of discouraging the declaration of virgin ODS as used ODS for destruction.*

The amount of ODS waste identified for destruction under this project consists of stocks which, in the context of the Lebanese CFC, ODS phase-out, can no longer be used as the market for CFCs has disappeared. Lebanon started CFC phase-out early; and from 1997 to 2009, manufacturing companies (refrigeration, foams and aerosols) converted from CFC to ozone-friendlier alternatives. Furthermore, the import of cars with CFC based mobile air-conditioning has been banned since 1999, which accounted for the majority

of the servicing demand.

The whole amount of ODS waste referred to above, and complete data on its composition and lack of possible alternative application has been compiled and endorsed at Government level; therefore, there are no ODS stocks to be destroyed in this project coming from amounts to be collected in the future (during project implementation), for which additional monitoring measures should be put in place.

It is important to note that, due to the fact that this project will not obtain any revenue from carbon financing in destroying the identified ODS stocks, the destruction strategy does not pose any perverse incentive that may encourage owners of ODS stocks to destroy them instead of giving them an alternative use.

- iv. *Valid assurances that the amount of ODS mentioned in the proposal will actually be destroyed, and the agencies should submit proof of destruction with the financial closure of the project.*

Amounts of ODS destroyed will be verified. Certification of destruction will be issued.

- v. *An exploration of other disposal options for the used ODS such as recycling and reuse opportunities;*

As stated above, the amount of ODS waste identified for destruction under this project consists of stocks which have to be disposed of due to the lack of alternative application.

---

## 2. BACKGROUND

---

### 2.1. Ratification of Amendments to the Montreal Protocol

Lebanon is a Party to the Montreal Protocol and is listed as an Article 5 country. The following are the dates on which Lebanon had ratified the Montreal Protocol and its amendments:

**Table 2.1.1: Status of Ratification of Amendments to the Montreal Protocol**

Agreement/ Amendment	Entry into force	Date of ratification
Vienna Convention	28 <sup>th</sup> June 1993	30 <sup>th</sup> March 1993
Montreal Protocol	28 <sup>th</sup> June 1993	30 <sup>th</sup> March 1993
London Amendment	29 <sup>th</sup> June 1993	31 <sup>st</sup> March 1993
Copenhagen Amendment	31 <sup>st</sup> July 2000	31 <sup>st</sup> July 2000
Montreal Amendment	31 <sup>st</sup> July 2000	31 <sup>st</sup> July 2000
Beijing Amendment	21 <sup>st</sup> November 2008	21 <sup>st</sup> November 2008

### 2.2. ODS Consumption in Lebanon

The following table shows the total consumption of all ODSs in Lebanon in ODP tonnes from

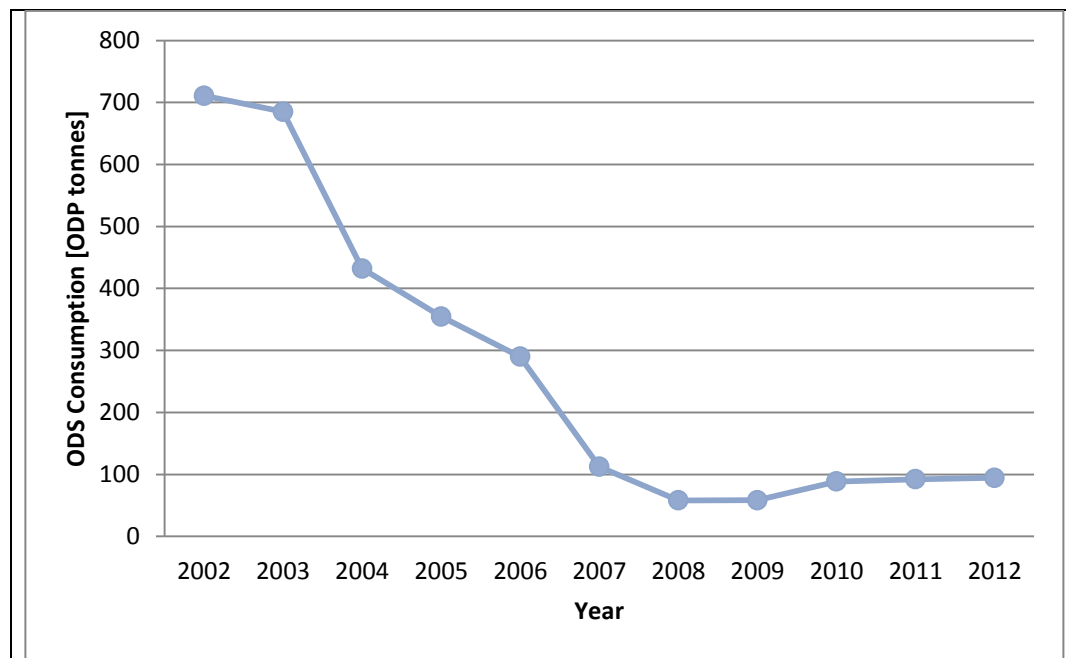
2002 to 2012 as reported by the Ozone Secretariat:

**Table 2.2.2: ODS Consumption (in ODP tonnes) in Lebanon<sup>2</sup>**

Year	ODS Consumption (in ODP tonnes)
2002	710.8
2003	685.0
2004	432.0
2005	354.6
2006	290.0
2007	112.4
2008	58.2
2009	58.4
2010	88.6
2011	92.26
2012	94.67

The following figure shows the above data graphically:

**Figure 2.2.1: ODS Consumption (in ODP Tonnes) in Lebanon**



CFC consumption was reported at zero ODP tonnes in 2009. In the same year, the consumption of HCFC began to increase. The increase in HCFC consumption corresponds to the steady increase in ODS consumption since 2009.

<sup>2</sup> Source: Ozone Secretariat

## 2.3. Stakeholders in ODS Activities in Lebanon

### Major Stakeholders

The **National Ozone Unit (NOU)/ Ministry of Environment** of Lebanon coordinates ODS phase-out programmes in the country and implements activities related to the commitment of the Montreal Protocol and its amendments at the national level.

Other Major Stakeholders include the Lebanese **Ministry of Industry, Ministry of Economy and Trade** and the **Customs Authorities**.

### Industry Associations

**The Association of Lebanese Industrialists (ALI)** was established in 1942 and is the main national association of manufacturing companies operating in Lebanon. It deals with both economic and social issues concerning business and advocates a policy of balanced industrial development for all Lebanese regions. (source: [www.ali.org.lb](http://www.ali.org.lb))

### Other Stakeholders

Other Stakeholders include the Lebanese **Hotels Association, Hospitals Association, Association of Importers**, and the **Lebanese Industrial Research Institute** ([www.iri.org.lb](http://www.iri.org.lb))

## 2.4. ODS- & Waste-Related Legislation

### 2.4.1. Literature Review

The Lebanese Framework Law on the Protection of the Environment (Law 444 / 2002) mentions the necessity to set standards and criteria to control the transport and movement of hazardous chemicals (import, production, extraction, conversion, marketing, purchase, utilization, abatement, transport and disposal). Through the ratification of the Stockholm Convention in 2002 (Law 432), Lebanon reinforced its commitment to regulate the production, utilization of persistent organic pollutants, specifically those which can be produced from thermal processes involving organic matter and chlorine (hazardous waste).

Other than the legal texts mentioned above, Lebanese legislation addresses hazardous chemicals in different laws, decrees and ministerial decisions especially the law 64/1988 on hazardous waste, and the decree 13389/2004 (amendment of Decree 8006/2002) on the management of health care waste (which includes hazardous and persistent chemicals). National environmental standards were issued by the Minister of Environment (Decision 8/1/2001), however incineration of hazardous wastes were not covered.

Disposal of hazardous material is controlled by the Law 64/1988 which sets the basis for licensing of facilities specialized in the disposal of hazardous waste, and gives the Ministry of Environment the authority to license and monitor these facilities. However, hazardous waste management is still lagging behind due to the delayed application of an integrated solid waste management strategy. Information on issues of chemical management can be found in Annex I.

There is no legislation in place that prohibits the export of hazardous material. Therefore, the export of unwanted ODS for destruction is a feasible option.

## **2.5. CFC and HCFC Phase-Out Programmes**

Lebanon's Country Programme incorporating the national strategy and action plan for controlling the use of ODS was approved at the 19<sup>th</sup> Meeting of the Executive Committee of the Multilateral fund in May 1996. To date, Lebanon is in compliance with the Montreal Protocol control schedule for substances under Annex A, B and E, through the implementation of a combination of projects; these include investment activities, technical assistance, training and capacity building, knowledge sharing, awareness raising and the institution of a proactive regulatory framework. In compliance with Article 4B of the Montreal Protocol, Lebanon has established a licensing system for import and export of Annex A, B, C and E controlled substances, which includes amounts collected as a result of recovery, recycling and reclamation. All importers and exporters of these substances are required to register and obtain licenses which are issued based on annual quotas and are subject to reporting requirements.

All remaining CFC phase-out activities were addressed through the National Phase-out Management Plan (NPP), which was approved at the 44<sup>th</sup> ExCom Meeting in November 2004, as a performance-based agreement with annual consumption and phase-out targets and complete phase-out of all remaining consumption of CFCs in Lebanon before the 1<sup>st</sup> January 2009. The CFC consumption reduction schedule proposed in the NPP was in compliance with the control schedule of the Montreal Protocol.

During the phase-out of CFCs, HCFCs were approved as interim substitutes for CFCs in many of the projects and activities supported by the Multilateral Fund. The sustained economic growth experienced by developing countries during the 1980s and thereafter, rapidly increased the demand for consumer and industrial products using HCFCs. Based on Decision XIX/6 of the MoP, Lebanon has also developed and received approval and funding for its HPMP overarching strategy.

## **2.6. Sources and Collection of ODS Waste**

The total amount of ODS waste considered for destruction in the context of this project has already been identified through the various ongoing collection efforts, according to the definitions in Annex VIII to the report of the 58th Meeting of the Executive Committee. These amounts have been confirmed through a series of data collection exercises. A national consulting team recruited by UNIDO has undertaken on-site data confirmation in the following sectors:

- manufacturing sector;
- servicing sector (servicing workshops; reclaim center)
- vocational training centers;
- end-user sites (malls/supermarkets, hotels, hospitals, cold rooms);
- importers (CFC, Halons, appliances);
- customs authorities;

- Government institutions; and
- Solid-waste sorting facilities.

The collection of ODS waste in Lebanon is executed through a voluntary scheme, involving refrigeration technicians, service workshops and ODS importers combining elements of the NPP. Under the NPP, equipment was provided to refrigeration and A/C technicians (recovery units and servicing tools) and service workshops and importers (recycling/reclaim units). Through the associated training programmes on best servicing practices emphasis was given to ODS containment, re-use or storage for future disposal, potentially through the established recycling/reclaim centers. Through these activities, the country was able to set up a collection network for obsolete ODS, with old ODS collected and stored in cylinders as opposed to being vented into the atmosphere.

The effectiveness of the scheme is demonstrated by the significant amount of CFCs that has been identified for destruction and the large share of the total that was actually accumulated via the existing network (see table 4.1.1).

The sources of ODS waste is further described in the sections below:

#### **2.6.1. Manufacturing Sector**

There are several manufacturers in the aerosols, foams and the refrigeration sectors. Most are predominantly small and unorganized. Many of whom have converted to non-CFC technologies through the assistance of the Multilateral Fund. These conversions took place between 1997 and 2009. The same companies, around 100, were surveyed for ODS stocks at their premises (Annex I). The survey revealed that none of the companies have kept CFC stock after the completion of conversion activities.

#### **2.6.2. Servicing Sector and end-users**

There is a significant population of existing domestic, commercial, industrial and transport refrigeration appliances, equipment and systems, requiring maintenance services in the country. In addition, due to the economic growth in the past two decades, there are several office buildings and complexes served by CFC-based central air conditioning centrifugal chillers, which require servicing. As a result, there is a fast growing servicing sector comprising of a large number of servicing establishments.

A few service establishments are part of the network of servicing centers owned or managed by the major domestic and commercial refrigeration equipment manufacturers and suppliers or a part of the network of local offices of the main dealers/distributors of refrigeration raw materials, components, consumables, etc. Most remaining service establishments are medium-sized and predominantly independent, catering to small and medium-sized end-users in the respective local markets. There are in addition, a large number of small servicing shops and freelancing service technicians.

Lebanon has approximately 410 refrigeration and air conditioning service workshops. Most workshops are small and operated by the owner himself with minimum staff of technicians. These workshops have a total of 1000-1500 technicians. Only some of these technicians have had some kind of training, but as part of CFC phase-out efforts, around 700 of them have been trained.

### **2.6.2.1. Refrigeration and Air-Conditioning Servicing Workshop**

Under the NPP in Lebanon, support to the refrigeration service sector in Lebanon was provided through the delivery of refrigerant recovery, recycling and recharging units for MAC systems and MAC servicing tools for 125 MAC workshops; and refrigerant recovery, recycling equipment for domestic, commercial appliances for 125 RAC workshops. The survey covered all assisted refrigeration servicing workshops as well as individual refrigeration technicians. 163 refrigeration servicing workshops provided feedback, indicating a total of 3861.2kg of stockpiled CFCs in cylinders. As for the freelance refrigeration technicians surveyed, no stocks of CFCs could be identified with them. (See Annex II)

### **2.6.2.2. National Training Centers**

The survey was able to identify 12 active vocational training institutes that teach and train technicians on maintenance and servicing techniques for refrigeration and air-conditioning systems. A total of 734.4 kg of CFC-12 in cylinders have been identified at centers. The list of training centers is found in Annex III.

### **2.6.2.3. End-users**

The end-users of products containing CFCs are in the domestic (household refrigerators/freezers and hot/cold water dispensers), commercial (small shops and other small commercial establishments, mini markets, departmental stores and supermarkets), industrial (process refrigeration systems, cold stores, etc) and transport refrigeration sub-sectors (refrigerated trucks and trailers) and in the mobile air conditioning (passenger cars and buses) and chillers (centrifugal chillers plants) sub-sectors.(see Annex IV)

## **HOTELS**

In Lebanon, there are around 333 hotels located in different regions across the country. 144 of these are ranked “four stars and above” with an average number of 105 rooms per hotel. The majority of hotels in Lebanon have modified or retrofitted their refrigeration and air-conditioning systems, explaining the cumulative unwanted ODS refrigerant stock of only 272kg from the 35 hotels that have supplied data for the survey. Furthermore, most of the hotels outsource maintenance services for their refrigeration and air-conditioning installations, which results in ODS stocks not being kept at hotel premises, rather are provided by the maintenance service provider upon request.

## **HOSPITALS**

There are 168 hospitals distributed across Lebanon. Feedback on the questionnaire has been collected from 55 hospitals, distributed geographically, with a range of 5 to 500 beds. Out of those surveyed 27 hospitals own CFC-charged refrigerators, 10 have CFC-based cold rooms at their premises. Most hospitals outsource maintenance services, therefore ODS stock are not kept in the premises. The hospitals have an amount of 304.2kg available in cylinders

## **MALLS AND SUPERMARKETS**

Since 2000, Lebanon has experienced a change in its retail sector, with the emergence of new malls and supermarket chains. Having relatively new and newly renovated buildings, of the 12 malls and supermarket chains (with all their branches), CFC stock of only one full cylinder (13.6kg) remained from a renovated mall using other refrigerants today. All other malls and supermarkets, using CFC-free technologies, had no unwanted ODS stocks.

## **COLD ROOMS**

Primarily agricultural cold rooms have been targeted under the survey, with agriculture being the third most important sector in the country after the industrial sectors<sup>3</sup>. Cold rooms surveyed showed a total stock of CFC of 1196.8kg in cylinders at the site of the cold rooms.

## **AIRPORT**

The Beirut Rafic Harriri International Airport has recently been renovated. No ODS stock has been kept at the airport premises. The airport is currently using R134a –based chillers, and FM 200-based as well as CO<sub>2</sub> fire extinguishers.

## **GOVERNMENT INSTITUTIONS**

Governmental institutions outsource the maintenance service of their refrigeration and air-conditioning systems, and no ODS stocks are kept at respective premises. However, halon stocks, a total of 1798.3kg of Halon – 1211 in fire extinguishers, were found at the premises of the Lebanese Army.

In 1998, the Lebanese Army, as per Decision 15/1 (ban of halon import), have decided to remove all halon-based fire extinguishers from use and stock them until destruction technology is available.

### **2.6.2.4. Recovery and Reuse of ODS refrigerants**

Legislation on Lebanon's ODS licensing system, Law Number 2604, covers the recovery and reuse of ODS refrigerant. In line with the regulation on recovery and reuse, 12 selected workshops and ODS importers were provided with a reclaim unit each under the NPP. These 12 workshops and importers serve as the framework of the refrigerant recovery and reuse network in the country, collecting and storing old CFC, which is suitable for destruction, in the process. This is reflected in the figures for unwanted ODS stock found at service workshop and importer premises. (See Annex II and V).

Furthermore, a total of 110 MAC recovery units were provided under the NPP and TPMP in Lebanon. These MAC workshops have also been reusing CFCs and collecting old CFCs at their site. (See Annex II). Under the NPP a centralized center was established at the Industrial Research Institute. The center is operational but is momentarily not being operated; thus no CFCs have been collected for destruction at the site.

---

<sup>3</sup> Main crops included cereals, fruits and vegetables, olives, grapes and tobacco. Lebanon, which has a variety of agricultural lands, from the interior plateau of the Bekaa Valley to the narrow valleys leading towards the sea, enables farmers to grow both European and tropical crops. For instance, tobacco and figs are grown in the south, citrus fruits and bananas are grown along the coast, olives in the north and around the Shouf Mountains, and fruits and vegetables in the Bekaa Valley.



### **2.6.3. Importers**

There is no production, export nor re-export of CFCs and Halons in Lebanon. The entire domestic demand for these products was met through imports into the country. Meetings were held with the 14 main importers of the CFCs. (see Annex V)

Importation of CFCs has been totally prohibited in Lebanon since 2009, upon the enforcement of the Licensing System Decree Nb. 2604 dated 24/09/2009. However, importers have started to decrease their import quota of CFCs prior to 2009. In line with the country's obligations under the Montreal Protocol, the Government of Lebanon provided regulatory and policy support to enable the industry to eliminate its ODS use; regularly interacting with stakeholders and importers to promote the phase-out of CFCs in the manufacturing and servicing sectors and import of alternatives.

CFC stocks were kept for the refrigeration servicing sector in Lebanon, particularly for the provision of maintenance services to existing old refrigerators and mobile air-conditioners. The need for CFCs has further decreased through: the retrofit of old systems; capacity-building activities - training of refrigeration technicians and trainers; development and availability of new technologies; and the short life-time of electrical appliances in Lebanon due to regular power cuts. Importers declared that they cannot market their inventory any more in the country, since the market for CFCs has disappeared completely. At the same time, these quantities of new ODS cannot be exported any more for consumption elsewhere except the country of import would obtain an essential use decision which would pertain to the type of stocks and their particular quality; this appears highly unlikely. Therefore, unwanted CFC stocks identified at the importer level amount to a total of 6356kg.

Importers and dealers of refrigeration appliances were also surveyed. Appliances imported into Lebanon are new and CFC-free, and are charged with CFC alternatives, such as HCFCs, HCs or HFCs. The majority of surveyed importers have their own after-sales service, including refrigeration and cooling systems servicing centers. However, none of these service centers claimed having stocks of CFCs.

Although the import of Halons has been prohibited since 1998 (as per Ministerial Decision 15/1), importers of fire-fighting systems and agents in the country were contacted to identify whether or not old stocks of halon cylinders still exist. No Halons stocks were stored at any of the surveyed importers. The alternatives currently available at the Lebanese market are HFC-227EA, ABC Powder, CO<sub>2</sub>, and AFFF foam.

### **LEBANESE CUSTOMS AUTHORITIES**

The import of CFCs and Halons had been controlled in close cooperation between the Ministry of Environment and the Lebanese Customs, since the inception of the National Ozone Unit in 1998. In 2000, based on Ministerial Decision Nb. 15/1, the import of Halons was banned in Lebanon. Whereas for CFCs, the import quota was regulated by the ODS Licensing System Decree Nb. 2604/2009. Consequently, the import of CFCs was banned in 2009.

The import data retrieved from the Customs Authorities shows that no ODS stocks are available at customs premises; noting that no CFCs nor Halons were imported into the country since 2009 and 1998, respectively.

#### **2.6.4. Waste Disposal Center**

Municipal solid waste collection and treatment is uneven across the various regions in Lebanon, lacking in incentives and management. Despite a few shy community-based incentives on municipal solid waste sorting, the majority of municipal garbage remains unsegregated and unsorted after collection. Nevertheless, existing sorting facilities were contacted, and no ODS stocks were found.

### **2.7. Disposal Programmes for Other Chemicals**

Lebanon ratified the 2002 Stockholm Convention on the phase out of POPs including PCBs by 2025 (Law Nb. 432/2002). Under the Stockholm Convention on Persistent Organic Pollutants, Parties shall promote in some cases and require in others the use of best available techniques, and promote the application of best environmental practices.

Through ratifying the Stockholm Convention, Lebanon has as each other Party taken the minimum measures to reduce the total releases derived from anthropogenic sources of each of the chemicals listed in Annex C, with the goal of their continuing minimization and, where feasible, ultimate elimination. Among the industrial sources that have the potential for comparatively high formation and release of these chemicals to the environment are cement kilns, burning hazardous waste.

It must be reiterated that cement kilns are primarily production processes for clinker, and not all operating conditions that may produce satisfactory clinker product are ideal for the destruction of wastes; for example, cement kilns tend to operate at lower exhaust oxygen levels and more elevated carbon monoxide levels than well-operated incinerators. Destruction of organic wastes requires not only high temperature and long residence time, but also the availability of adequate oxygen and sufficient mixing between the organic compounds intended for destruction and the oxygen. Conditions can arise where wastes are not destroyed adequately if waste is not introduced properly to the kiln or available oxygen levels are too low. Good design and operation are critical to the use of cement kilns for this application. More information on issues pertaining to cement kilns can be found in Annex VI.

---

## **3. PROJECT OBJECTIVES**

---

The Government of Lebanon is in the possession of a substantial amount of unwanted ODS which need to be destroyed. Those stocks already collected and known to the Government and which are eligible under decision 58/19 will be destroyed under this project.

There is potential for future stocks of unwanted ODS, in particular CFCs from end-of-life recovery of still existing larger, still operating CFC installations, and HCFCs with future gradual phase-out of the different HCFCs in Lebanon. For these future stocks, the process to follow to achieve their destruction (transport, storage, export, destruction) will have been demonstrated, the related procedures will be in place, and lessons learned documented, making future destruction of unwanted ODS an exercise that the country then has the means to organize itself.

The project preparation included all necessary steps to implement the project on the basis of destruction in the country; for this purpose, cement kilns have been considered as destruction facilities. However, while technically possible, the commitment of the kilns and regulatory issues make this technical possibility difficult to implement. The Demonstration Project on ODS Waste Management and Disposal in Lebanon, with its primary objective to demonstrate a repeatable approach to ODS waste destruction and at the same time covering the known collected waste in the country, is intending to export the ODS to be destroyed. In doing so, the project will develop the appropriate technical and human resources capacity for ODS waste management at country level, including aggregation, storage and disposal.

The project will destroy 12.73 metric tonnes of CFC waste collected from various sectors in Lebanon, and will seek to reinforce and connect the existing collection network with the destruction process established. With the involvement of relevant stakeholders from the onset of project implementation, the country will be able to set up an effective and sustainable ODS disposal infrastructure and process. The strategy for export executed in the project can be applied as a long-term method for the country to destroy its future unwanted stockpiles of ODS.

In addition, a strategy will be formulated focusing on the destruction of the 1.8 metric tonnes of unwanted Halon stocks collected.

---

## 4. PROJECT SCOPE

---

### 4.1. CFC Banks

The stocks for which the destruction strategy is to be developed include 12,733.2kg of CFCs, collected from various sectors in Lebanon, as shown in the following table:

**Table 4.1.1: CFC Stocks for Disposal in Lebanon**

Sector	Quantity/kg	Percentage of total CFC stocks/ %
Service workshops	3861.2	30.32
Training centers	734.4	5.77
Hotels	272.0	2.14
Hospitals	299.2	2.35
Malls and supermarkets	13.6	0.10
Cold rooms	1196.8	9.40
Importers	6356.0	49.92
<b>TOTAL/ kg</b>	<b>12,733.2</b>	<b>100</b>

Approximately 50% of the CFC stocks identified for destruction under this project have been collected by importers. Another 30% have been stocks by service workshops across the country. With large end-users outsourcing maintenance services on their refrigeration systems, as described in 3.6, these expectedly have a smaller proportion of the CFCs in stock.

## 4.2. Halon Banks

The Lebanese Army has the majority of unwanted Halons in stock at its premises (1798.3kg), with only 5kg found at a hospital.

These Halon stocks are not foreseen to be destroyed under this project. The scope of the project covers the development of a strategy to export and destroy Halons in an accredited facility outside of Lebanon.

## 4.3. Total Amount of ODS Waste for Disposal in the Project

The following table summarizes the total ODS stock identified in Lebanon, showing a total amount of 14,526.5kg available for destruction, including 12,733.2kg of CFCs (eligible) and 1803.3kg of Halons (eligibility uncertain). No stocks of CTC or TCA have been identified in all surveyed sectors. The budget is based on the assumption of non-eligibility of halon stocks for destruction funded by the MLF, thus only formulation of a related strategy is being proposed.

**Table: 4.3.1** ODS Stock – Overall Summary by Sector

Sector	CFC-12/kg	CFC-11/kg	R-502/kg	R-500/kg	Halon/kg	Total/kg
Service workshops	2570.4	1250	40.8	0	0	<b>3861.2</b>
Training centers	734.4	0	0	0	0	<b>734.4</b>
Hotels	231.2	0	27.2	13.6	0	<b>272.0</b>
Hospitals	299.2	0	0	0	5	<b>304.2</b>
Malls and supermarkets	13.6	0	0	0	0	<b>13.6</b>
Cold rooms	1196.8	0	0	0	0	<b>1196.8</b>
Importers	5540	816	0	0	0	<b>6356.0</b>
Lebanese Army	0	0	0	0	1798.3	<b>1798.3</b>
<b>TOTAL</b>	<b>10,585.6</b>	<b>2066.0</b>	<b>68.0</b>	<b>13.6</b>	<b>1803.3</b>	<b>14,536.5</b>

## 5. PROJECT STRATEGY

During project preparation, various strategies were discussed and assessed by relevant stakeholders in the country and UNIDO. The following was considered:

1. Destruction at dedicated ODS incineration plant (reactor cracking; gaseous fume oxidation).
2. Destruction through co-incineration with other waste (rotary kiln incineration; liquid-incineration; municipal solid waste incineration; mass burn incinerators; modular combustors; refuse-derived fuel).
3. Destruction in a cement kiln.
4. Destruction through plasma technologies (argon plasma arc technology; inductively coupled radio frequency plasma; nitrogen plasma arc; microwave plasma).

5. Destruction through non-incineration technologies (gas-phase catalytic dehalogenation; super-heated steam reactor).
6. Destruction of ODS in the country, in existing or new facility.
7. Export for destruction in a facility abroad.

The original strategy submitted at the 72<sup>nd</sup> ExCom Meeting entailed the establishment of a destruction facility located in the country, which is detailed in Annex VI. However, in response to the decision of the ExCom at the 72<sup>nd</sup> Meeting, UNIDO in cooperation with the NOU of Lebanon, researched and explored the option of exporting ODS for destruction abroad. The situation in the country has developed in a way that currently only the export appears feasible. The implementation of this strategy is detailed in section 6.1 below. The strategy for export falls under the primary objective of the Demonstration Project on ODS Waste Management and Disposal in Lebanon as it demonstrates a repeatable and sustainable approach to ODS waste destruction, and at the same time covers the identified ODS waste stocks in the country.

---

## **6. PROJECT IMPLEMENTATION**

---

### **6.1. Exportation of ODS for destruction in a facility abroad**

There are a number of certified destruction facilities across the globe, including facilities in the U.S., in Europe, Australia and East Asia. UNIDO has had experience in destroying ODS in facilities in the U.S. and Europe. Geographically, Lebanon is not restricted in its choice between Europe and the U.S.

The voluntary carbon markets, which would have allowed to provide additional income to the project, are volatile and the interest for carbon credits in ODS destruction overall has been in steady decline over the past couple of years; current market prices do not justify the additional efforts necessary to possibly transport the waste further, and those to be able to issue and sell the associated credits. For the possibility of accruing carbon credits through the voluntary carbon market e.g. the Climate Action Reserve (CAR) or Verified Carbon Standards (VCS), some guidelines have to be considered. The main differences being that CAR requires ODS that is sourced from Article 5 countries to be imported and destroyed in the U.S. Despite this constraint there are more ODS destruction methodologies registered under CAR than VCS. In addition, CAR offsets (Climate Reserve Tons, CRTs) are priced higher than VCS carbon credits.

Though there is a possibility to accrue CRTs, thus offsetting costs for destruction in the U.S. as co-financing, due to the current slump in carbon credit prices from ODS destruction, even for historically higher priced credits such as CRTs, destruction in Europe is a notable cost-effective option due to lower transportation costs from Lebanon to Europe compared to transport costs from Lebanon to the U.S. Therefore, the old ODS stock targeted under this project will be exported to a destruction facility in Europe. This means that destruction will take place without the issuance of credits for reduced GHG emissions.

### **6.1.1. QUALITY TESTING AND AGGREGATION OF ODS FOR EXPORT**

Two aggregation points will be established; one in Beirut and one in Tripoli for ODS stocks collected in the northern and southern parts of Lebanon, respectively. Beirut and Tripoli, are where most old ODS stocks have been stored, and are respectively located near ports. This makes the aggregation and further transport of these stocks easier. The old ODS stocks collected will be brought by a collection truck to the respective aggregations points.

Facilities have been identified by the NOU, both of which are vocational centers and have adequate storage areas for cylinders and are also able to handle ODS accordingly. The capacities of the selected aggregation facilities will be set up to accommodate the CFC stocks identified under this project as well as for future streams of unwanted ODS to be destroyed. This involves the assistance from the Industrial Research Institute (IRI) for the testing of ODS and operation of the banking facilities. The facilities will be run as semi-government institutions under the NOU/Ministry of Environment and the IRI.

In this context, the project will support the identified aggregation facilities by providing them with the necessary equipment (ISO cylinders) and supporting them in the analysis of the composition of the stocks.

In order to prepare the designated facilities for aggregation activities, the project will provide

- 4 ISO cylinders at 950 liters each;
- 6 ISO cylinders at 200 liters each.

Prior to aggregation, testing of the composition of the various cylinders arriving at the aggregation facilities will be done at the facilities themselves. This will be done with a double objective:

- Check that the content of the cylinders corresponds to that reported by the sources of the ODS stocks;
- Aggregate ODS amounts according to similarities in composition and purity (including oil removal where necessary, decanting of cylinders into ISO containers, labelling and documentation).

### **6.1.2. TRANSPORTATION OF THE ODS STOCKS**

All aggregated stocks in the facility in Tripoli will be transported to the facility in Beirut, or vice versa, depending from which port the shipment is launched. The distance between Beirut and Tripoli is around 84km.

Prior to the transport of all stocks, an export approval from the national government has to be acquired, as well as an import approval from the country where the CFCs are to be destroyed. Transportation will be by sea and road, depending on the location of the selected destruction facility.

### **6.1.3. DESTRUCTION**

Destruction at a facility abroad will depend on national guidelines.

There are several options for destruction of ODS in the Europe. Within the EU, there are several incineration facilities licensed for ODS disposal, particularly in the new member states (EU legislation allows import of ODS for environmentally sound destruction). However, Hungary, Romania and the Czech Republic have stricter national legislation than the EU and import of hazardous waste for disposal is prohibited in these countries. Therefore, the only EU countries that accept imports of ODS waste are Germany, France, Netherlands, Poland and Spain, where hazardous waste import is allowed and the facilities have expertise in dealing with imported hazardous waste. All registered facilities in the EU are in line with TEAP requirements for destruction technologies, as these are requested by the EU for a facility to be licensed to destroy ODS waste.

The destruction facility will be selected through an open bidding process, to ensure the most cost-effective option is chosen for the country. The selection criteria will be based on whether the facility, a) is in compliance with the technologies approved by the Technology and Economic Assessment Panel of the Montreal Protocol<sup>4</sup>, b) meets the performance and emissions requirements set out by TEAP, and c), is a registered EU facility. As an EU registered facility its destruction technologies have to be included in the Annex of Regulation (EC) No 1005/2009 of the European Parliament and of the Council of 16 September 2009 on Substances that Deplete the Ozone Layer.

To ensure that the destruction of its future unwanted ODS stocks is conducted in an environmentally-friendly, cost-effective manner, Lebanon will be able to repeat the selection exercise.

### **6.1.4. VERIFICATION OF DESTROYED ODS AMOUNTS AND REPORTING**

The facilities in the EU operate on an independent basis. Depending on the facility, the verification of the compositions and amounts of ODS prior to destruction, can take place at the place of origin or at the destruction facility itself. This is either conducted by the destruction facility or by an independent lab. After destruction, a certificate is issued by the facility.

## **6.2. Policy Support**

The option for establishing an ODS destruction facility in the country would require considerably more policy support than the option of exporting ODS for destruction abroad. The latter entails the review of legislation with regards to the movement and classification of hazardous waste, to allow for export of ODS waste for destruction. In both cases, policy support is required to reinforce effective legislation addressing ODS disposal in the county.

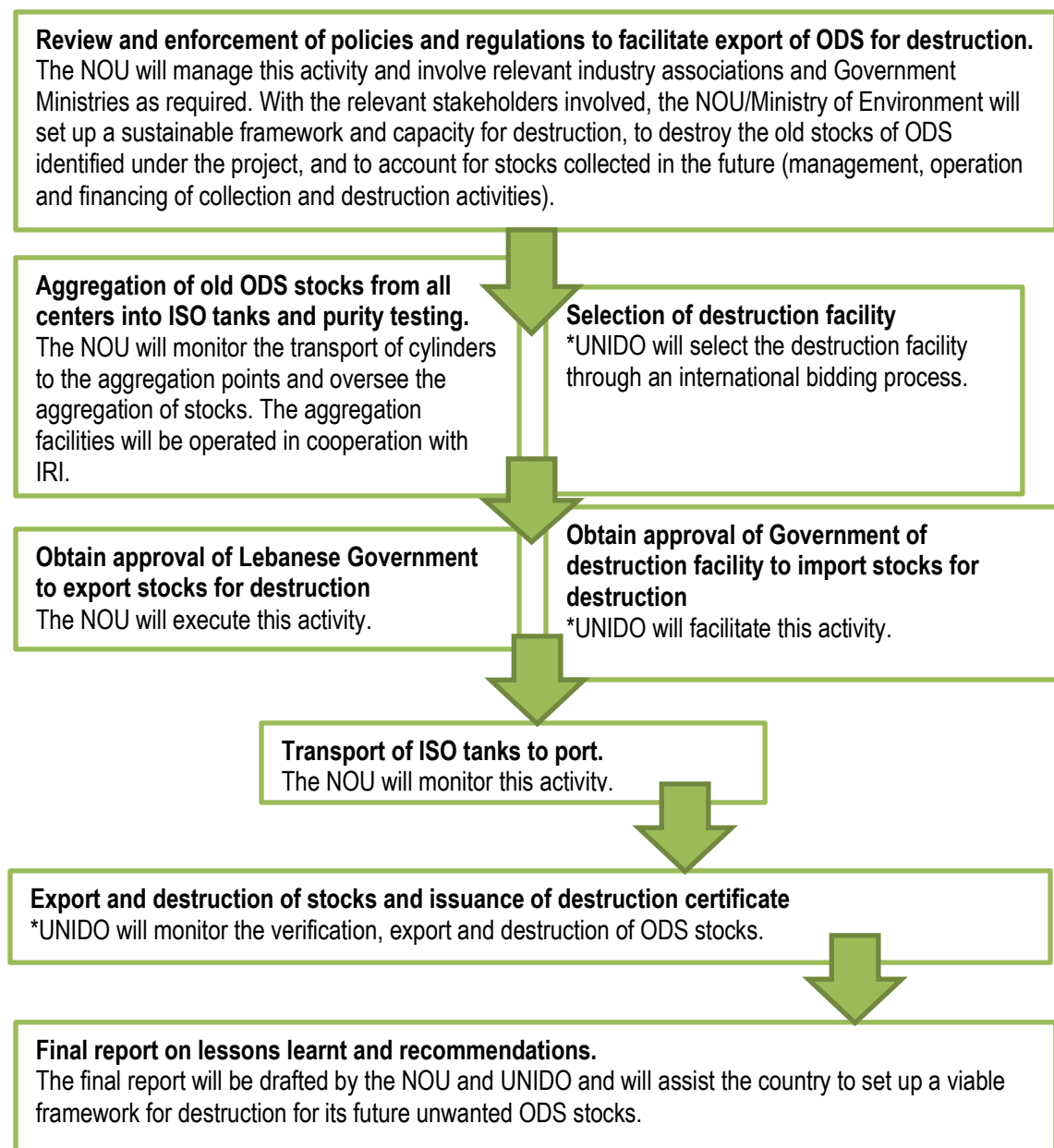
---

<sup>4</sup> TEAP - Report of the Task Force on Destruction Technologies:  
[http://ozone.unep.org/teap/Reports/Other\\_Task\\_Force/index.shtml](http://ozone.unep.org/teap/Reports/Other_Task_Force/index.shtml)

### 6.3. Project Management and Implementation Schedule

All project activities will be implemented by the NOU and UNIDO, details of which are illustrated in the flowchart below. All activities to be executed locally will be monitored by the NOU. UNIDO will assist the NOU, and will manage all other activities. To demonstrate the sustainability of the chosen strategy to export ODS for destruction, each activity will be implemented such that it can be repeated for future unwanted ODS stocks collected in the country. At the end of the demonstration project, all activities implemented by UNIDO (\*) will be managed by the NOU/MoE and the relevant stakeholders identified under the project.

Figure 6.3.1 – Flowchart of Implementation Steps and Monitoring and Management





The time-critical elements for which the project can be monitored are as follows:

- Aggregation of collected ODS for export;
- Approval of Lebanese Government to export stocks for destruction;
- Approval of Government of destruction facility to import stocks for destruction;
- Destruction of stocks and issuance of destruction certificate.

The execution of these activities on time would contribute to the timely completion of the project. The table below shows the time schedule of the various implementation steps over an 18-month period.

**Figure 6.3.2: Table of Implementation Schedule for ODS Destruction Abroad**

Activities		Duration of Project (Project Months)																							
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
0	Introduction and enforcement of policies and regulations to facilitate export of ODS for destruction	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█						
1	Transportation of 12.73 metric tonnes of CFCs from different centers to aggregation points	█	█	█	█																				
2	Substance and impurity testing, oil removal where necessary, decanting of cylinders into ISO containers, labelling and documentation			█	█	█	█																		
3	Obtain approval of Lebanese Government to export stocks						█	█																	
4	Obtain approval to import stocks from Government of destruction facility						█	█																	
5	Shipment of ISO tanks for export to another country, including insurance and GPS system; Transportation inland from port to destruction facility.									█	█	█	█	█											
6	Destruction (incl. purification and testing at destruction site); Issuance of destruction certificate														█	█									
7	Preparation of a final report detailing all activities of the project and lessons learned																█	█	█	█					

---

## **7. PROJECT SUSTAINABILITY AND DEMONSTRATION VALUE**

---

The implementation of this project will contribute to the long-term sustainability related to the disposal of Lebanon's future unwanted ODS stocks. The significant amount of existing stocks that will be destroyed under this project will have demonstrated the procedures for their destruction abroad (transport, storage, export, destruction) and extracted the lessons learned, thereby facilitating the destruction of future stocks. As such, future exports of ODS for destruction can be carried out by the country itself. The project will also provide Lebanon the opportunity to revise its legislation on ODS disposal to ensure unwanted ODS is collected (ODS disposal infrastructure) and possible legislative hurdles for its export and destruction are eliminated. This entails the reinforcement of the existing collection scheme and connecting it to the export and destruction capacities established under this project i.e. collection truck, operational aggregation points, export route.

It should also be noted, that HPMP Stage II, will have its primary focus on the servicing sector; which, among others, will have a component on strengthening the collection scheme.

The original strategy submitted at the 72<sup>nd</sup> ExCom Meeting detailed the capacity for local ODS destruction. Although at present local destruction is not feasible, it is a technically viable option that would also ensure for a long-term sustainable solution with regards to the disposal of Lebanon's unwanted ODS stocks. This is described in detail in Annex VI.

## 8. PROJECT BUDGET

### 8.1. Total Budget - Export of Unwanted ODS for Destruction Abroad

**Table 8.1.1: Project budget – Export of unwanted ODS for destruction**

Item (includes 5% contingencies)	Cost (USD)		
	MLF	Co-financing	Total
Transportation of 12.7 metric tonnes of CFCs from different centers to aggregation points	8,000	24,450	32,450
Substance and impurity testing, oil removal where necessary, decanting of cylinders into ISO containers. labelling, documentation)	21,925	21,925	43,850
Shipment of ISO tanks for export to another country, including insurance and GPS tracking system; Transportation inland from port to destruction facility. (Total transport @ \$1.5/kg)	19,050	0	19,050
Destruction (Purification and testing at destruction site @ \$1/kg; Destruction @ \$5/kg)	63,500	0	63,500
Contingency	3,500	0	3,500
Policy support; PMU	7,500	7,500	15,000
Halon disposal strategy	0	5,000	5,000
<b>TOTAL (USD)</b>	<b>123,475</b>	<b>58,875</b>	<b>182,350</b>

The following table shows the break-down of funding requested to the Multilateral Fund:

**Table 8.1.2: Project Funding under the Multilateral Fund**

Cost Item	Cost (USD)
<b>Project funding requested to the Multilateral Fund</b>	<b>123,475</b>
-UNIDO	123,475
<b>Project support costs</b>	<b>8,643</b>
-UNIDO 7%	8,643
<b>Total requested from the Multilateral Fund</b>	<b>132,118</b>

The project funding requested from the Multilateral Fund for the destruction of CFCs (12,733.2kg) is USD 123,475 (excluding support costs), with a total cost efficiency of **9.69 USD/kg** of ODS waste.

### 8.2. Project Co-Financing

The co-financing secured for this project is in-kind.

---

## ANNEXES

---

### **Annex I: Management of Chemicals in Lebanon**

A number of ministries play a role in chemical management in Lebanon. The Ministry of Agriculture covers activities concerned with agriculture pesticides, the Ministry of Public Health is responsible for pesticides destined for domestic use, the Ministry of Energy and Water is responsible for the import of petroleum derivatives, whereas the Ministry of Environment deals with hazardous and industrial chemicals as per its inaction Law Nb. 690 dated 27/08/2005 (amendment of Law 216 dated 2/4/1993).

The National Standards for Environmental Quality (based on Ministerial Decision 8/1 dated 1/3/2001) are generic standards which were developed for all sectors of industry covering stack emissions and wastewater discharges.

These standards are an important tool for the Ministry of Environment and the industrial sector, for combating common environmental problems, monitoring and enforcing environmental quality, developing environmental mitigation plans leading to sustainable development and future economic prosperity as well as fulfilling duties dictated by international conventions.

The emission limit values elaborated were the result of profound research work and an in-depth overview, revision and analysis of similar legislation in neighbouring countries, the Arab League regulations and the international agreements and obligations to which Lebanon is committed. The decision on the exact values of the thresholds was based on the level and the characteristics of the respective pollutant, the available emission combating technology, the local ecological, geographical and physical characteristics as well as the economic capacity of the Lebanese industry. These standards were scrutinised through an exhaustive evaluation process with all concerned stakeholders and were agreed upon on a consensus basis, allowing them to be nationally owned.

For stack emissions, generic as well as specific emission limit values have been developed for the main sectors of industry, including:

- The energy sector
- Power generators
- Portland cement
- Glass manufacturing
- Electroplating
- Food processing
- Battery manufacturing
- Aluminium manufacturing
- Municipal waste incinerators

Among these mentioned, two sectors are of importance for this study on potential ODS destruction in Lebanon;

**Table A:****Portland Cement Industry**

PARAMETER	ELV FOR NEW FACILITIES	ELV FOR EXISTING FACILITIES	REMARK
O2 correction	-	-	Not necessary
NOx (Calculated to NO2) [mg/m <sup>3</sup> ]	1500	2500	Grate firing pre-heater
	2000		Cyclone pre-heater
SOx (Calculated to SO2) [mg/m <sup>3</sup> ]	800	850	

**Table B:****Municipal Waste Incineration**

PARAMETER	ELV FOR NEW OR EXISTING FACILITIES
O2 correction (always)	11%
<b>Capacity &lt; 0.75 t/h</b>	
Dust [mg/m <sup>3</sup> ]	30
CO [mg/m <sup>3</sup> ]	100
Total carbon of organic pollutants [mg/m <sup>3</sup> ]	20
SOx (Calculated to SO2) [mg/m <sup>3</sup> ]	100
HCl [mg/m <sup>3</sup> ]	50
HF [mg/m <sup>3</sup> ]	2
<b>Capacity &gt; 0.75 t/h</b>	
Dust [mg/m <sup>3</sup> ]	30
CO [mg/m <sup>3</sup> ]	100
Total carbon of organic pollutants [mg/m <sup>3</sup> ]	20
SOx (Calculated to SO2) [mg/m <sup>3</sup> ]	200
NOx (Calculated to NO2) [mg/m <sup>3</sup> ]	400
HCl [mg/m <sup>3</sup> ]	60
HF [mg/m <sup>3</sup> ]	4
Hg [mg/m <sup>3</sup> ]	0.05
The Sum of Cd & TI [mg/m <sup>3</sup> ]	0.5
PCDD ng I-TEQ/Nm <sup>3</sup>	0.1
PCDF ng I-TEQ/Nm <sup>3</sup>	0.1

In Lebanon, the cement industry represents the largest source of CO<sub>2</sub> emissions in terms of air quality. Lebanon has five plants (Holcim Lebanon, Cimenterie Nationale sal, Ciment de Sibline, Cimenterie du Moyen Orient, Societe Libanaise des Ciments Blancs) of which four are located in the North of Lebanon. Raw materials include silica, aluminium, iron and lime which is obtained from calcium carbonate. Other raw materials are introduced as sand, clay, shale, iron ore and blast furnace slag.

In 1997, the Ministry of Environment prepared a guidance note (Decision 191/1) for the cement industry on how to protect the environment and its workers from exposure to industrial pollutants. The note included conservation measures of air and water quality and kick-started a process of self-monitoring stack emissions. Cement plants monitor their emissions on a daily basis and submits monthly report to the Ministry of Environment for review.

Lebanon has signed several conventions related to waste disposal (hazardous and non-hazardous) and pollution including the Convention on the Prevention of Marine Pollution by Dumping of Wastes and Other Matter (1973), the Barcelona Convention for Protection against Pollution in the Mediterranean Sea (1976) and the Protocol for the Protection of the Mediterranean Sea against Pollution from Land-based Sources in Athens (1980). In 1994, Lebanon ratified the Basel Convention regulating the trans-boundary movement of hazardous wastes and their disposal. The

Convention also requires the Government to improve waste management, cease open burning of solid waste, minimize the generation of municipal and medical waste through source recovery, reuse, recycling, waste separation, and promoting products that generate less waste.

The following sections describe key regulations and policy issues related to hazardous waste in Lebanon:

## **BASEL CONVENTION**

The Basel Convention was ratified by the Government of Lebanon in 1994 by the Law Nb. 387. The Ministry of Environment released a Ministerial Decision 71/1 dated 19 May 1997 (amendment of Decision 22/1 dated 17/12/1196) that regulates the import of wastes to Lebanon. The decision presents two separate waste lists: allowed waste and banned waste. The MoE receives frequent applications and invoices for waste shipment imports to Lebanon. Waste importers must be classified industrial establishments and must produce a number of documents. Since Lebanon was and still is under pressure to receive hazardous wastes, the Ministerial Decision 71/1/1997, gave the Ministry of Environment the authorization to prohibit a list of hazardous wastes to enter into the country and to put importation conditions to a certain list of hazardous wastes, mainly; (a) allowance of recyclable raw materials to be imported for industrial usage, (b) approval of the Ministry of Environment at the source of origin of exportation of such waste along with laboratory test results (bacteriological, physical and chemical), and (c) commitment from the recipient industry specifying that the imported materials will not be used other than for final disposal, neither for waste to energy applications.

It is to be noted that the ODSs (namely CFC-11, CFC-12, CFC-13, CFC-111, CFC-112, CFC-113, CFC-114, CFC-115, Halon-1211, Halon-1301 and Halon-2402) in the form of wastes had been listed by the Ministry of Environment under Decision 71/1/1997 as hazardous wastes that are not allowed to be imported into the country.

**Table C: Hazardous Waste Not Allowed to be Imported into Lebanon (List B – Decision 71/1/1997)**

<b>HS CODE</b>	<b>DESCRIPTION OF WASTES</b>
29.03.41	Waste of Halogenated derivatives of acyclic hydrocarbons with fluorine and chlorine (CFC-11)
29.03.42	Waste of Halogenated derivatives of acyclic hydrocarbons with fluorine and chlorine (CFC-12)
29.03.43	Waste of Halogenated derivatives of acyclic hydrocarbons with fluorine and chlorine (CFC-113)
29.03.44	Waste of Halogenated derivatives of acyclic hydrocarbons with fluorine and chlorine (CFC-114 and CFC-115)
29.03.45	Waste of Halogenated derivatives of acyclic hydrocarbons with fluorine and chlorine (CFC-13, CFC-111 and CFC-112)
29.03.46.10	Waste of Halons

## **STOCKHOLM CONVENTION**

Lebanon ratified the 2002 Stockholm Convention on the phase out of POPs including PCBs, by 2025 (Law Nb. 432/2002). Thus, Lebanon has taken the minimum measures to reduce the total releases derived from anthropogenic sources of each of the chemicals listed in Annex C, with the

goal of their continuing minimization and, where feasible, ultimate elimination. Among the industrial sources that have the potential for comparatively high formation and release of these chemicals to the environment are cement kilns burning of hazardous waste.

The selection of wastes is a complex process and is influenced by many factors, such as kiln operation, the nature of the waste itself, the general impact on the environment, the desired clinker quality and the probability of the formation and release of chemicals listed in Annex C of the Stockholm Convention and other releases into the environment. The operator should develop a fuels evaluation and acceptance procedure. Based on this procedure an assessment is carried out of the effect of the fuel on plant emissions and the potential need for new equipment or procedures to ensure that there is no negative impact on the environment.

## EUROPEAN UNION

Whereas on the international perspective, a wide range of regulations and policies had been developed regarding the hazardous wastes and their treatment. The incineration of hazardous wastes in Europe is regulated under the Council Directive 94/67/EC. The main aim of this Directive is to provide for measures and procedures to prevent or, where that is not practicable, to reduce as far as possible negative effects on the environment, in particular the pollution of air, soil, surface and groundwater, and the resulting risks to human health from the incineration of hazardous waste and, to that end, to set up and maintain appropriate operating conditions and emission limit values for hazardous waste incineration plants. Article 7 of the Directive 94/67/EC, shows that the incineration plants shall be designed, equipped and operated in such a way that at least the following emission limit values are not exceeded in the exhaust gases:

**Table D: Emission limit values from incineration of Hazardous Waste in the EU**

PARAMETER	ELV FOR INCINERATION OF HAZARDOUS WASTE	
<b>Daily Average Values</b>		
Total Dust [mg/m <sup>3</sup> ]	10	
CO [mg/m <sup>3</sup> ]	50	
Total carbon of organic pollutants [mg/m <sup>3</sup> ]	10	
SO <sub>x</sub> (Calculated to SO <sub>2</sub> ) [mg/m <sup>3</sup> ]	50	
HCl [mg/m <sup>3</sup> ]	10	
HF [mg/m <sup>3</sup> ]	1	
<b>Half-hourly average values</b>	<b>A</b>	<b>B</b>
Total Dust [mg/m <sup>3</sup> ]	30	10
CO [mg/m <sup>3</sup> ]	150	100
Total carbon of organic pollutants [mg/m <sup>3</sup> ]	20	10
SO <sub>x</sub> (Calculated to SO <sub>2</sub> ) [mg/m <sup>3</sup> ]	200	50
HCl [mg/m <sup>3</sup> ]	60	10
HF [mg/m <sup>3</sup> ]	4	2
<b>All average values over the sample period of a minimum of 30 minutes and a maximum of 8 hours</b>		
	<b>New Plants</b>	<b>Existing Plants</b>
Hg [mg/m <sup>3</sup> ]	0.05	0.1
The Sum of Cd & TI [mg/m <sup>3</sup> ]	0.05	0.1
The sum of Sb, As, Pb, Cr, Co, Cu, Mn, Ni, V & Sn	0.5	1

The Directive states that “the emission of dioxins and furans shall be reduced by the most progressive techniques. At the latest from 1 January 1997, all average values measured over the



sample period of a minimum of six hours and a maximum of eight hours shall not exceed a limit value of 0.1 ng/m<sup>3</sup> “.

## **Main Findings**

Existing EU regulations explicitly require the recovery of all ODS/F-gases from certain categories of products and equipment at end of life. For the “other” categories, including construction foams, the obligation to recover (or immediately destroy) depends on its technical and economic feasibility. The new ODS Regulations offer also the option of destruction without prior recovery. For some end-users — namely vehicles and household/small commercial appliances — schemes are also mandated to assign responsibility for and ensure the safe disposal of products and equipment and the ODS/F-gases contained therein.

Currently, there are very little, if any, known recovery of ODS/F-gases from construction foam applications at time of demolition, with the exception of some in Germany (BING 2008). For other products/equipment for which ODS/F-gas recovery is required by law, actual recovery levels across the EU vary across Member States and end-use, and are somewhat uncertain due to a lack of comprehensive reported data. A number of factors may reduce actual recovery levels, including insufficient technician training, a lack of recovery equipment, high recovery/disposal costs, small quantities remaining in equipment at time disposal, potential losses during transport/handling, and others.

As for Lebanon, over the past decade, the government has developed important legislation (Law 444/2002, Decree 8006/2002 and Decree 13389/2004) and acceded to several new conventions (2001 Stockholm Convention). Additional legislation is still essentially needed to complete the Solid Waste Management system including:

- Law on Integrated Solid Waste Management
- Waste – to – Energy Legislation
- Compost and Sludge Reuse Standards
- E-Waste Legislation

Lebanon, like the rest of the world, is experiencing a quantum leap in electronic waste. The composition of Lebanon’s E-waste is poorly documented. Therefore, in its 2010-2012 work program, the Ministry of Environment included preparing “guidelines for the treatment of specific types of waste, for example, used batteries, electronic equipment and expired goods” as a priority action. A decree to control and monitor e-waste still needs to be approved.

On another hand, some e-waste reduction initiatives had been taking place from a Lebanese NGO “Beeatoona”. This NGO launched in 2008 and “E-waste and Battery recycling for a better environment” project in Lebanese schools, with the aim of raising awareness among students, teachers, and their families on environmental and health risks associated hazardous disposal of electronic waste and household batteries. The waste (mostly computers) had been dismantled and stored in a warehouse for subsequent shipment to waste disposal / recycling facilities abroad. But, warehousing had proved to be difficult because export procedures are complicated and time-consuming as they must comply with the Basel Convention.

This NGO initiative could be considered as the only shy incentive programme that had been launched in Lebanon, as no other government outreach incentive programme regarding the

electronic wastes (especially the refrigerators, air conditioners and other ODS-containing equipment) had been initiated.

Although the review reveals that no particular law has been approved and issued in relation to the destruction of hazardous wastes in Lebanon, it can be noted that to provide regulatory and policy support for enabling the industry to eliminate ODS, the Government of Lebanon has taken the following initiatives and actions:

- a) ODS were included in the list of items requiring import licensing in 1998;
- b) Prohibition on imports of Halons from 1998;
- c) Exemption of all MLF funded inputs from import taxes from 1998;
- d) Regulations on control and monitoring of ODS usage from 2003;
- e) Issuance of Decree on ODS licensing and quota system in 2009, which is currently under enforcement;
- f) Active monitoring of the progress of implementation of projects funded by MLF;
- g) Formulation of guidelines and regulations as necessary for policy implementation;
- h) Supporting public awareness initiatives and campaigns for promoting ozone layer protection at the consumer level;
- i) Regular interaction with other ministries and departments, industry representatives and implementing agencies for information dissemination related to impact of policy measures.

## Annex II: ODS Stock of Refrigeration and A/C Service Workshops

Table of Refrigeration and A/C Service Workshops with unwanted ODS stock - Surveyed workshops that did not report any ODS stock are not listed

Company Name/Address		Type of workshop (MAC/RAC)	Type of CFC (R-11/ R-12/ R-502)	Quantity/ kg	Number of cylinders
1	Ahmad Al Lawzi / Koura	RAC	R-11	0	0
			R-12	81.6	6
			R-502	0	0
2	Abd el Salam Monla / Tripoli	RAC	R-11	0	0
			R-12	136	10
			R-502	0	0
3	Alaa el dine Bikdach / Koura	RAC	R-11	0	0
			R-12	27.2	2
			R-502	0	0
4	Mohamad Bhamdouni / Tripoli	MAC	R-11	0	0
			R-12	40.8	3
			R-502	0	0
5	Al Hassan Car Services / Tripoli	MAC	R-11	0	0
			R-12	122.4	9
			R-502	0	0
6	Mahsen el Hachem / Tripoli	MAC	R-11	0	0
			R-12	68	5
			R-502	0	0
7	Moukaddem car service / Tripoli	MAC	R-11	0	0
			R-12	204	15
			R-502	0	0
8	Armobel / Mkalles	RAC	R-11	0	0
			R-12	13.6	1
			R-502	13.6	1
9	Cooling Team / Verdum	RAC	R-11	0	0
			R-12	13.6	1
			R-502	13.6	1
10	Electro Hadchiti / Hadath	MAC	R-11	0	0
			R-12	13.6	1
			R-502	0	0
11	Hammoud for A/C & Ref. / Hadath	RAC	R-11	0	0
			R-12	40.8	3
			R-502	0	0
12	Saade Ref. & A/C / Jdita	RAC	R-11	250	1
			R-12	136	10
			R-502	0	0
13.	Electro Waness / Zahle	MAC	R-11	0	0
			R-12	68	5
			R-502	0	0

14.	Khaled Taha Car electric / Ghaza	MAC	R-11	0	0
			R-12	27.2	2
			R-502	0	0
15.	Abdel Latif For Ref./ Sohmor	RAC	R-11	0	0
			R-12	27.2	2
			R-502	0	0
16.	Yasser Assi Est. for Cooling / Hirmel	RAC	R-11	0	0
			R-12	40.8	3
			R-502	0	0
17.	Kiwan Workshop for A/C / Saghbine	RAC	R-11	0	0
			R-12	27.2	2
			R-502	13.6	1
18.	Ahmad Hawi Workshop / Zahle	RAC	R-11	0	0
			R-12	27.2	2
			R-502	0	0
19.	Elias Seif for Cooling & Heating / Zahle	RAC	R-11	0	0
			R-12	27.2	2
			R-502	0	0
20.	Fouad Khoury for cooling / Jdita	RAC	R-11	0	0
			R-12	54.4	4
			R-502	0	0
21.	Elie Semaan / Amchit	RAC	R-11	0	0
			R-12	13.6	1
			R-502	0	0
22.	Salameh Heat & Cool / Byakout	RAC	R-11	0	0
			R-12	27.2	2
			R-502	0	0
23.	Ziad Ephrem / Amchit	MAC	R-11	0	0
			R-12	40.8	3
			R-502	0	0
24.	Garage Louis Youssef / Zouk Mosbeh	MAC	R-11	0	0
			R-12	13.6	1
			R-502	0	0
25.	Naoum Farah / Baskinta	RAC	R-11	0	0
			R-12	27.2	2
			R-502	0	0
26.	Nabil Essayleh Est. / Hadi Nassralah	MAC	R-11	0	0
			R-12	27.2	2
			R-502	0	0
27.	Garage Ahmad Ibrahim / Tallet Khayat	MAC	R-11	0	0
			R-12	27.2	2
			R-502	0	0
			R-11	0	0
			R-12	13.6	1

28.	Arabi Bros. / Haret Hreik	MAC	R-502	0	0
			R-11	1000	4
			R-12	40.8	3
29.	Solaire / Haret Hreik	RAC	R-502	0	0
			R-11	0	0
			R-12	13.6	1
30.	Omar Zayat for Ref./ Mar Elias st	MAC	R-502	0	0
			R-11	0	0
			R-12	1128.8	83
31.	Al Amouri for Ref. & AC / Ghobeiri	MAC	R-502	0	0
			R-11	1250	5
			R-12	2570.4	189
	<b>TOTAL</b>		R-502	40.8	3

### Annex III: ODS Stock of National Training Centers

Table of Vocational Training Centers with unwanted ODS stock

	Company Name/Address	Type of CFC (R-12)	Quantity/ kg	Number of cylinders
1	National Institute for Technical Training (Dekwaneh , Beirut)	R-12	40.8	3
2	Technical and Industrial Institute (Dekwaneh , Beirut)	R-12	54.4	4
3	Art and Technical School (Dekwaneh , Beirut)	R-12	0	0
4	Ajaltoun Technical School (Ajaltoun, Kesrwan)	R-12	0	0
5	Saida Technical School (Saida, South)	R-12	13.6	1
6	Badnayel Technical School (Badnayel, Bekaa)	R-12	27.2	2
7	Bent Jbeil Technical School (Bent Jbeil, South)	R-12	27.2	2
8	Al Amlieh Technical School ( Beirut )	R-12	0	0
9	Tripoli Technical Institute (Tripoli, North Lebanon)	R-12	544	40
10	Deir Amar Technical School (Deir Amar, North Lebanon)	R-12	0	0
11	Bekaa Technical School (Khyara, Bekaa)	R-12	27.2	2
12	Bir Hassan Technical School (Beirut)	R-12	0	0
	<b>TOTAL</b>	<b>R-12</b>	<b>734.4</b>	<b>54</b>

## Annex IV: ODS Stock of Large End-users

Table of End-users with unwanted ODS stock - Surveyed end-users that did not report any ODS stock are not listed

Company Name/Address		Type of CFC (R-11/ R-12/ R-500/R-502/ Halons)	Quantity/ kg	Number of cylinders
<b>HOTELS</b>				
1	Palma Resort / Tripoli	R-12	136	10
		R-500	0	0
		R-502	0	0
2	San Stephano Resort / Batroun	R-12	68	5
		R-500	0	0
		R-502	0	0
3	Regency Palace Hotel / Adma	R-12	13.6	1
		R-500	13.6	1
		R-502	13.6	1
4	Le Commodore Hotel / Hamra	R-12	13.6	1
		R-500	0	0
		R-502	13.6	1
<b>TOTAL for hotels</b>		<b>R-12</b>	<b>231.2</b>	<b>17</b>
		<b>R-500</b>	<b>13.6</b>	<b>1</b>
		<b>R-502</b>	<b>27.2</b>	<b>2</b>
<b>HOSPITALS</b>				
1	Islami Hospital –A / Tripoli	R-12	149.6	11
		Halons	0	0
2	Islami Hospital-B / Tripoli	R-12	108.8	8
		Halons	0	0
3	Dallaah Hospital / Saida	R-12	0	0
		Halons	5	1
4	U M C (Rizk Hospital) / Achrafieh	R-12	27.2	2
		Halons	0	0
5	Mazboud Hospital / Chouf	R-12	13.6	1
		Halons	0	0
<b>TOTAL for hospitals</b>		<b>R-12</b>	<b>299.2</b>	<b>22</b>
		<b>Halons</b>	<b>5</b>	<b>1</b>
<b>MALLS &amp; SUPERMARKETS</b>				
1	A B C / Dbayeh	R-12	13.6	1
<b>TOTAL for malls and supermarkets</b>		<b>R-12</b>	<b>13.6</b>	<b>1</b>
<b>COLD ROOMS</b>				
1	Maarad (samad) / Tripoli	R-12	163.2	12
2	EL Bissar / Tripoli	R-12	408	30
3	EL Chami / Tripoli	R-12	272	20
4	AL Chermal / Tripoli	R-12	340	25
5	Cortas Conserve S.A.L.	R-12	13.6	1
<b>TOTAL for cold rooms</b>		<b>R-12</b>	<b>1196.8</b>	<b>88</b>

## Annex V: ODS Stock of Importers of Industrial Gases

Table of Importers of Industrial Gases with unwanted ODS stock

	Company Name/Address	Type of CFC (R-11/ R-12)	Quantity/ kg	Number of cylinders
1	A RASSY & CO S.A.L	R-11	0	0
	Al Nahr	R-12	3500	257
2	ABCO for Cooling Conditioning & General Trade	R-11	0	0
	Mar Mikhael	R-12	0	0
3	B.T. DIGITAL CLIMATE	R-11	0	0
	Beirut	R-12	0	0
4	THE NATIONAL TRADING COOPERATION - CARRIER	R-11	0	0
	Mark Mikhael	R-12	0	0
5	E.K. Cooling Technology	R-11	0	0
	Naccach	R-12	0	0
6	Electro Moussa	R-11	0	0
	Beirut	R-12	0	0
7	EMACO S.A.R.L	R-11	0	0
	Mar Mikhael	R-12	0	0
8	FARJALLAH TRADING CO.	R-11	0	0
	Beirut	R-12	0	0
9	FRIGIGAS	R-11	0	0
	Nahr El Mott	R-12	0	0
10	FRIGO ADAM	R-11	0	0
	Mar Mikhael	R-12	0	0
11	FRIGO LIBAN	R-11	816	3
	Accaoui	R-12	2040	150
12	K.G. GROUP S.A.R.L	R-11	0	0
	Ain Roummaneh	R-12	0	0
13	Cedar Cool	R-11	0	0
	Beirut	R-12	0	0
14	Baalbaki Group S.A.	R-11	0	0
	Beirut	R-12	0	0
<b>TOTAL</b>		<b>R-11</b>	<b>816</b>	<b>3</b>
		<b>R-12</b>	<b>5540</b>	<b>407</b>

## **Annex VI: Development of a Strategy for Local ODS Destruction**

The original strategy submitted at the 72<sup>nd</sup> ExCom Meeting entailed the establishment of a destruction facility located in the country, which is detailed below. However, in response to the decision of the ExCom at the 72<sup>nd</sup> Meeting, UNIDO in cooperation with the NOU of Lebanon, researched and explored the option of exporting ODS for destruction abroad. The situation in the country has developed in a way that currently only the export appears feasible. The implementation of this strategy is detailed in section 6.1 of the project document.

However, should the situation in the country change again and should sufficient co-funding be available to carry out local destruction with the same level of Multilateral Fund funding, UNIDO proposes to provide the necessary flexibility to do so while maintaining the amounts destroyed.

### **Cement Kilns**

The selection of wastes is a complex process and is influenced by many factors, such as kiln operation, the nature of the waste itself, the general impact on the environment, the desired clinker quality and the probability of the formation and release of chemicals listed in Annex C of the Stockholm Convention and other releases into the environment. The operator should develop a fuels evaluation and acceptance procedure. Based on this procedure an assessment is carried out of the effect of the fuel on plant emissions and the potential need for new equipment or procedures to ensure that there is no negative impact on the environment.

Performance requirements based on best available techniques for control of PCDD/PCDF in flue gases should be  $< 0.1$  ng I-TEQ/Nm<sup>3</sup> with reference conditions of 273 K, 101.3 kPa, 11% O<sub>2</sub> and a dry gas basis.

As per the BAT/BEP Guidelines of Stockholm Convention in order to control kiln process, continuous measurement is recommended for the following parameters:

- Pressure;
- Temperature;
- O<sub>2</sub> content;
- NO<sub>x</sub>;
- CO, and possibly when the SO<sub>x</sub> concentration is high;
- SO<sub>2</sub> (a technique is being developed to optimize CO with NO<sub>x</sub> and SO<sub>2</sub>).

Over and above these parameters control of mercury (if mercury content in the waste is high) should be ensured.

To accurately quantify the emissions, continuous measurement is the best available technique for the following parameters (these may need to be measured again if their levels can change after the point where they are measured to be used for control):

- Exhaust volume (can be calculated but the process is regarded by some as complicated);
- Humidity;
- Temperature at particulate matter control device inlet;
- Dust/particulate matter;
- O<sub>2</sub>;
- NO<sub>x</sub>;
- Dust;



- SO<sub>2</sub>;
- CO.

Regular periodical monitoring is the best available technique for the following substances:

- Metals and their compounds;
- Total organic carbon/organic components;
- HCl, HF;
- NH<sub>3</sub>;
- PCDD/PCDF.

Measurements of the following may be required occasionally under special operating conditions:

- Destruction and removal efficiency, in the case of destruction of persistent organic pollutants in cement kilns;
- Benzene, toluene, xylene;
- Polycyclic aromatic hydrocarbons;
- Other organic pollutants (principal organic hazardous constituents, e.g. chlorobenzenes, PCB including coplanar congeners, chloronaphthalenes).

It is especially important to measure metals when wastes with higher metal content are used as raw materials or fuels.

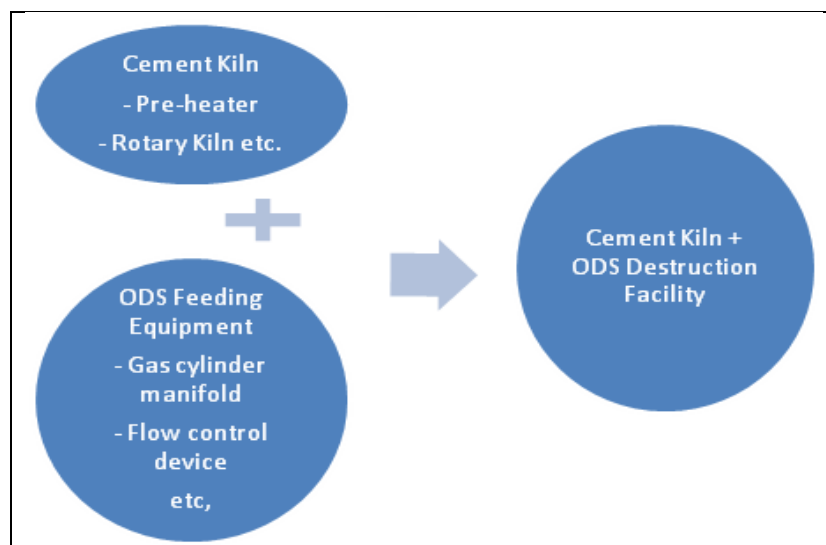
## Establishment of a Local Destruction Facility

### I) MODIFICATION OF THE CEMENT KILN

Cement kilns can be modified or retrofitted to destroy ODS in them with high efficiency, especially due to the high temperatures that are prevalent in them. However, in addition to the installation of ODS feeding equipment, flue gas and stack monitoring systems need to be installed and the emissions monitored accordingly.

The following diagram represents the process of modifying existing cement kilns to handle ODS:

**Figure A: Cement Kiln Retrofitting to Destroy ODS**



## **II) PILOT TESTING**

### **Approach**

This stage of the project implementation is of paramount importance in order to ensure adequate disposal of the bulk of ODS waste at a later stage. The pilot tests will be designed to ensure that the facility meets the following requirements:

- High ODS removal capacity;
- The operational parameters should be set in a way to minimize the generation of decomposition products like chlorides and fluorides;
- Proper treatment of chlorides, fluorides and other toxic wastes in exhaust gases, effluent water, ashes etc.

During this stage of project implementation, special attention will be paid to the following:

- Flue gas and stack monitoring systems in the cement kiln have to be checked and, if necessary, re-engineered in its design parameters to ensure that relevant emissions are monitored accordingly;
- The input of ODS into the facility needs to be controlled to avoid chlorine deteriorating the quality of the cement produced during ODS destruction activities.

If the test results are not satisfactory, proper action has to be taken to ensure that all detected problems are rectified, followed by another pilot run.

### **Technical Aspects of the Pilot Tests**

The Technology and Economic Assessment Panel (TEAP) of the Montreal Protocol set up a Task Force on Destruction Technologies (TFDT). The Task Force, in its report in 2002, established destruction efficiency and air emissions recommendations for ODS destruction.

For determining whether facilities are operating with minimal impacts to human and environmental health while destroying ODS, the “TEAP recommendations” include specifications for the following parameters:

- Destruction and Removal Efficiency (DRE);
- Emissions of Polychlorinated Dibenzodioxins (PCDDs) and Polychlorinated Dibenzofurans (PCDFs)/Dioxins and Furans, Hydrochloric Acid (HCl), Chlorine (Cl<sub>2</sub>), Hydrofluoric Acid (HF), Hydrobromic Acid (HBr), Bromine (Br<sub>2</sub>), Particulate Matter (PM), and Carbon Monoxide (CO);
- Technical capability when destroying ODS on a commercial scale.

The following table presents the DRE and emission limits recommended by the TEAP (for

concentrated sources).

**Table B: Destruction Efficiency and Air Emission Limits Recommended by TEAP for ODS Destruction**

Efficiency/Emission	Limit <sup>a</sup>
DRE (%)	99.99 <sup>b</sup>
PCDD/PCDFs (ng/m <sup>3</sup> )	0.2
HCl/ Cl <sub>2</sub> (mg/m <sup>3</sup> )	100
HF (mg/m <sup>3</sup> )	5
HBr/ Br <sub>2</sub> (mg/m <sup>3</sup> )	5
Particulate Matter (mg/m <sup>3</sup> )	50
CO (mg/m <sup>3</sup> )	100

Source: Task Force on Destruction Technologies, TEAP (2002)

<sup>a</sup> Emission limits are expressed as mass per dry cubic meter of flue gas at 0°C and 101.3 kPa corrected to 11 percent O<sub>2</sub>.

<sup>b</sup> A DRE of 95 percent is required for the destruction of dilute sources of ODS (i.e., foams containing ODS).

Measurement of the ODS destruction efficiency during the pilot tests will be done as follows:

- The ODS concentration in the exhaust gas, and the quantity of ODS fed for destruction should be identified. The ODS destruction can be verified based on Removal Efficiency (DRE), shown below:

$$DRE = \frac{N_1^{in} - \sum_i N_i^{out}}{N_1^{in}}$$

Where  $N_1^{in}$  is the number of moles of ODS fed into the system and  $N_i^{out}$  is the number of moles of  $i^{\text{th}}$  type of ODS that is released into the atmosphere.<sup>5</sup>

- ODS removal efficiency can be checked by the ODS concentration in the exhaust gas or decomposition efficiency. The ODS concentration in the final exhaust gas should be 1 ppm or lower or the decomposition efficiency shall be 99.99% or higher;
- The ODS destruction efficiency will be checked at appropriate frequencies.

### III) QUALITY TESTING AND AGGREGATION

The ODS waste to be destroyed in the context of this project has been collected through the existing collection activities in the country, as detailed in Section 2.6., namely, the ODS stock collected at various refrigeration service workshops, training centers and large end-users all across the country.

In order to increase the cost-efficiency of the destruction activities, the project plans to aggregate<sup>6</sup> the identified stocks at a reduced number of locations in the country; the objective is

<sup>5</sup> Formula recommended by TEAP 2002.

<sup>6</sup> The concept “aggregation” as defined in this project document cannot be linked to “collection” as defined in Annex VIII of document UNEP/OzL.Pro/ExCom/58/53. Collection takes place outside the scope of the project, in the context of the various collection activities already in place as detailed in Section 2.6. In the context of this

to reduce the transportation costs by optimizing transportation loads on their way to the identified destruction facility. With regard to the selection of the aggregation facility, two options have been assessed in this regard:

- Aggregation prior to transport of the ODS waste to the destruction facility;
- Aggregation at the destruction facility.

The proposed ODS destruction facility – Holcim Lebanon – is located in Chekka in North Lebanon. The establishment of two aggregation points, one at the destruction facility and one in Beirut, for ODS stocks collected in the northern and southern parts of Lebanon, respectively.

In this context, the project will support the identified aggregation facilities by providing them with the necessary equipment (ISO cylinders) and supporting them in the analysis of the composition of the stocks.

In order to prepare the designated facilities for aggregation activities, the project will provide

- 4 ISO cylinders at 950 liters each;
- 6 ISO cylinders at 200 liters each.

Prior to aggregation, testing of the composition of the various cylinders arriving at the aggregation facilities will be done at the facilities themselves. This will be done with a double objective:

- Check that the content of the cylinders corresponds to that reported by the sources of the ODS stocks;
- Aggregate ODS amounts according to similarities in composition and purity.

The latter is especially important given the fact that, for destruction in cement kilns, purity levels above 95% are recommended for the ODS stocks to be destroyed in order to avoid impurities which, upon thermal incineration, may degrade the cement quality by affecting the pH content inside the kiln. However, in the context of this project, it is worth noting that the above-mentioned purity level is not a requirement given the fact that the feed rate of ODS waste is very small compared to the throughput of the kiln. Notwithstanding this, an effort will be made during the aggregation activities in order to maximize purity to the extent possible.

#### **IV) TRANSPORTATION OF THE ODS STOCKS TO THE CEMENT KILN**

The transportation distances to be covered during the project implementation are determined by the following factors:

- Location of the established collection points;
- Location of the selected aggregation facilities;
- Location of the selected destruction facility;
- Existing road network.

---

project, aggregation is understood as a first stage of the transportation activities which aims at minimizing transportation costs.

A clear identification of the distances to be covered is needed in order to have an accurate estimate of transportation costs; in this regard, the following has to be noted:

- Approximately 50% of the ODS stocks identified are located in northern Lebanon. These will be transported from their various collection points and aggregated at the destruction facility in Chekka.
- The other 50% of the ODS stocks are located in their various collection points in the rest areas of Lebanon. These will be transported to the aggregation facility in Beirut.
- The distance from the aggregation facility in Beirut to the destruction facility in Chekka is around 65km.

## **V) DESTRUCTION**

### **Description of the Destruction Facility**

The selected cement kiln where destruction activities in the context of this project will be undertaken is located in the city of Chekka, some 65km from the capital Beirut. Founded in Switzerland in 1912, Holcim is one of the world's leading suppliers of cement and aggregates (crushed stone, sand and gravel). Holcim also supplies ready-mix concrete and asphalt, and provided related services. The Holcim plant in Chekka was built in 1929 and has been operational since. In 1997, it was equipped with a 65 meter-long modern kiln, with a production capacity of about 5800 tonnes of clinker per day, totalling 1.8 million tonnes per year.

The main operational parameters are as follows:

- Temperature in the precalciner: 900 ° C
- Kiln temperature is in excess of 900° C at the inlet and can reach up to 2000° C at the lower end
- Clinkerisation occurs at temperatures at 1400 - 1650° C for 0.5 – 2 hours.

With regard to emissions during normal operation, the following has to be noted:

- **Dust emissions** are regularly monitored at Holcim – Lebanon. For recorded dust emissions that reach 25mg/m<sup>3</sup>, bag filters are taken in for maintenance. The process consist of separating one compartment filter (1 of 4), reducing the kiln production rate by 30% for 9-10 hours, the time it takes to service a filter or exchange it for a new one.
- Kiln **stack emissions** are continuously controlled with Holcim's own advanced online monitoring system. The recordings conform to Lebanese standards and Holcim's international standards. Reports of the recorded emissions are sent to the Ministry of Environment on a monthly basis. The following table gives an overview of some emission levels at Holcim plant. Recorded emissions are far lower than the set local standards.

**Table C: Comparison of Emission Levels at Holcim-Chekka Plant (on 5<sup>th</sup> June 2012) with National and International Standards**

POLLUTANT	Decision 52/1 (29/7/1996)	Decision 8/1 (30/1/2001)	European Directive	Holcim- Lebanon Standards	Measured emissions fr. Holcim- Lebanon on 5 <sup>th</sup> June 2012	Deviation from Decision 8/1
Dusts	50 mg/m <sup>3</sup>	200 mg/m <sup>3</sup>	30 mg/m <sup>3</sup>	<30 mg/m <sup>3</sup>	1 mg/m <sup>3</sup>	-99.5%
SO <sub>2</sub>	500 mg/m <sup>3</sup>	800 mg/m <sup>3</sup>	200 mg/m <sup>3</sup>	<500 mg/m <sup>3</sup>	7.4 mg/m <sup>3</sup>	-99.1%
NO <sub>x</sub>	1200 mg/m <sup>3</sup>	1500 mg/m <sup>3</sup>	800 mg/m <sup>3</sup>	<800 mg/m <sup>3</sup>	752.9 mg/m <sup>3</sup>	-49.8%

Moreover, once a year, an accredited organisation is mandated to monitor the emissions at the plant (2 to 3 weeks). A copy of the official report is sent to the Ministry of Environment.

### Operational Details during Destruction Activities

#### Operational Control Conditions

The facility will be operated in a similar manner to ordinary cement production so that successful destruction of ODS and safe control of exhaust gas are ensured. ODS feeding will be undertaken as follows:

- The flow rate of ODS to be fed will be determined taking into account the capacity of the exhaust gas treatment system and the influence on quality of products, or cement clinker;
- ODS will be sprayed at the position close to the burner before the kiln under the normal operation control conditions;
- Equipment for feeding ODS will consist of an oil filter, a flow meter and other relevant device to feed ODS quantitatively;

The following will be done to monitor the operational control conditions during destruction activities:

- Measurement of the following items:
  - Physical conditions at the specific points of the kiln where ODS are destroyed, mainly temperature of combustion;
  - Exhaust gas volume after treatment;
  - Concentration of carbon monoxide (CO) at the outlet of exhaust gas;
  - Concentration of oxide (O<sub>2</sub>) at the outlet of the incinerator or the secondary combustion chamber;
- Measurements will be pursuant to the procedures set in the applicable laws and regulations and the related standards;
- Measurements should be conducted on a daily basis.

## **Measurement of Toxic Substances**

During ODS destruction activities, plant operators will take the following actions to measure the quantities of toxic substances released, following the normal continuous monitoring procedures:

- Verification that the exhaust gas emitted during ODS destruction activities meet the standards specified by the applicable laws and regulations. The following items which could generate or increase through the ODS destruction shall be measured:
  - Concentration of hydrogen chlorides (HCl) in the final exhaust gas;
  - Concentration of hydrogen fluorides (HF) in the final exhaust gas;
  - Concentration of dioxins in the final exhaust gas;
  - Content of fluorides in effluent water;
  - Concentration of hydrogen ions in effluent water.
- The measurements should be pursuant to the procedures set in the applicable laws and regulations and related standards;
- Measurements will be conducted at least once per year in addition to those required in the applicable laws and regulations;

## **VI) VERIFICATION OF DESTROYED ODS AMOUNTS AND REPORTING**

The Project Management Unit established during the implementation of the will require the cement kiln, where destruction will take place, to provide a destruction verification document, which documents that the materials entering the facility will be destroyed. Copies of these verification documents will also be submitted to the points of origin of the ODS waste. This verification document must include:

- Name and address of the destruction facility;
- Date(s) of destruction of the received ODS waste (in case of destruction in several batches, an indication of the amounts destroyed in each batch will be included);
- An indication of the fact that the ODS waste has been destroyed with a DRE of at least 99.99 per cent as established by TEAP;
- Signature of a person entitled to legally represent the cement kiln, as well as of an accredited independent industry leading inspection, verification, testing and certification service.

Upon completion of the project activities focused on achieving the destruction of the ODS waste, the PMU will be responsible for the preparation of a final report detailing all activities of the project and lessons learned. Such a report will be endorsed by the Lebanese Government and UNIDO, and will be shared with all stakeholders for their understanding.

The proposed project does not contemplate the possibility of generating carbon credits from the

destruction activities to be undertaken during implementation of the project; however, revenues from carbon financing are considered as one of the components of the financing mix that will contribute to ensure long-term sustainability of ODS destruction activities in the country beyond implementation of this project, as described in Section 7 of this project document.

With this in mind, implementation of the project will provide the framework to set up a code of good practices in line with the requirements of the applicable voluntary carbon market schemes which, from the perspective of verification and reporting activities, will include the following:

- Documentary evidence shall be provided to verify the origin of the destroyed ODS waste. Such evidence may consist of shipping manifests, bills of lading, other commercial documentation, and addresses of households, commercial premises and other evidence of collection of the products;
- Where ODS waste is recovered from products that have been imported specifically for their disassembly, destruction facility shall request documentary evidence, such as shipping manifests, bills of lading and evidence of collection of the products in the originating country, to demonstrate the origin of such products;
- Where ODS waste consists of refrigerant mixtures containing substances whose destruction does not generate carbon credits, the destruction facility shall develop a methodology to determine the amount of ODS contained in such mixtures. This shall be achieved using a mass balance analysis and/or other approach (based on conservative assumptions), as appropriate to the nature and scale of the project.

In addition to this, UNIDO will apply its experience in previously approved ODS waste destruction projects to advise the Government of Lebanon on how to set up an electronic verification system with the following functionalities:

- Registry of companies / facilities owning ODS waste (points of origin) with an indication of stored amounts and amounts processed for disposal;
- Registry of enterprises carrying out ODS waste collection;
- Database on ODS destruction data, such as destroyed amounts, regular inspections of the destruction facility and storage sites.



## Implementation Schedule for ODS Destruction in Lebanon

Activities		Duration of Project (Project Months)																								
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	
0	Introduction and enforcement of policies and regulations to facilitate ODS destruction in the country																									
1	Preparation of an implementation plan for the modification of the cement kiln																									
2	Preparation of engineering designs and modification of the cement kiln																									
3	Pilot tests to be done in the modified kiln																									
4	Quality testing and aggregation ODS waste from all sources																									
5	Transportation of the tanks to the cement kiln																									
6	Final destruction of the stocks and issuance of a final destruction certificate																									
7	Preparation of a final report detailing all activities of the project and lessons learned																									

## Total Budget for ODS Destruction in Lebanon

Table showing New Budget for Local ODS Destruction

Cost Item	Cost (USD)		
	MLF	Co-financing	Total
Available funding	147,733		
Modification of the cement kiln	0	141,750	141,750
Pilot testing	16,602	25,398	42,000
Transportation	11,000	21,450	31,900
Substance and impurity testing, documentation)	10,814	15,750	26,564
Destruction	68,948	0	68,948
Contingency	5,368	0	5,368
Policy support; PMU	30,000	0	30,000
Halon disposal strategy	5,000	0	5,000
<b>TOTAL (USD)</b>	<b>147,733</b>	<b>204,348</b>	<b>351,531</b>

## Project Sustainability and Demonstration Value

### a) Technical factors contributing to sustainability of ODS destruction efforts in Lebanon

Destruction in a cement kiln ensures a destruction capacity which is large enough to handle the ODS waste generated in the country, and even that which could arrive at the facility from neighbouring countries. Taking into account that the facility's main activity is not ODS waste destruction but cement production, the sustainability and profitability of the facility's operation is not subject to a regular inflow of ODS waste. The risk that operation of the cement kiln may be halted due to low demand of cement in the country is very low. Even in the case of such a halt occurring for a limited period of time, this would not have an impact on ODS destruction in the cement kiln as the batch-based destruction scheme could be easily adapted at point of aggregation level to avoid accumulation of ODS waste in the cement kiln's storage facilities.

### b) Introduction of an effective legislation addressing ODS disposal

The decree issued in 2009 for an ODS licencing and quota system is enforced rigorously in the country. This has allowed Lebanon to be in compliance with the Montreal Protocol's phase-out targets, collecting the unwanted ODS stocks at various locations across the country. There is however no existing law which relates to the destruction of hazardous wastes, including ODS, which are considered hazardous substances. The issuance of a law is essential for the destruction of ODS to be conducted in an environmentally-friendly and sustainable manner.

This demo project provides Lebanon with the opportunity not only to have a facility which can destroy the ODS in an environmentally friendly manner within the country, but also to

issue and enforce a law to mandatorily destroy unwanted ODS. Once the law is in place and is enforced, and the project is implemented, the owners of the stocks will be moved to pay for the testing, transportation and destruction of their stocks. This process would only need the support of the Lebanese government to fix the prices of these activities. This will also provide Lebanon with an opportunity to plan for future disposal operations involving unwanted HCFCs, since their phase-out has also started from 1<sup>st</sup> January 2013.

At the onset of the implementation of this project, informative sessions will be organized by the National Ozone Unit to inform all relevant stakeholders about the necessity for Lebanon to have laws mandating the destruction of ODS and other hazardous wastes. In addition, with the set-up of an ODS destruction facility in the country, implementation of the project would contribute to create the adequate enabling environment to enforce the obligation to destroy ODS waste, once the law is in place.

**c) Awareness raising at stakeholder and civil society level**

A thorough stakeholder engagement process will be undertaken in order to ensure for a cooperative environment in the setting up of an ODS disposal infrastructure in the country. Concerns from environmental groups need to be addressed by explaining the environmental integrity of the process and that the resultant products, if handled carefully, would not violate any regulatory or emission norms, apart from having no health and safety implications.

**d) Facilitation of access to carbon financing for ODS destruction upon completion of the project**

Upon completion of the project, revenues from carbon financing should be considered as one of the components of the financing mix that will ensure sustainability of Lebanon's efforts in undertaking environmentally friendly ODS waste disposal.

There are currently two international carbon market protocols that are important while discussing the issue of generating carbon financing from ODS destruction projects. There is a proven track record of projects that have gained carbon credits by destroying ODS stocks by applying two voluntary standards: the Verified Carbon Standard (VCS), and the Climate Action Reserve (CAR); both standards have robust ODS destruction methodologies in place.

In the case where ODS waste is to be destroyed in the selected facility in the country, the only applicable voluntary carbon market scheme is VCS, due to the fact that CAR only accepts ODS destruction activities undertaken in certified facilities located in the United States. Implementation of the project will provide the framework to set up a code of good practices in line with the requirements of the VCS methodology with specific emphasis in verification and reporting activities.

Upon completion of the project, the cement kiln will be in a position to obtain carbon credits for future destruction activities due to the experience obtained (through the implementation of this project) in terms of project cycle management for registration under VCS. This will pull destruction prices down under any of the following two scenarios:

- a) Should ownership of the ODS stocks remain under the points of origin throughout the project cycle, they will obtain a revenue through carbon credit sales, thus partially

compensating for the costs incurred in undertaken destruction of the collected ODS waste; in this case, the role of the destruction facility from the point of view of the carbon financing is that of a mere service provider;

- b) Should ownership of the ODS stocks be transferred to the destruction facility, this will be the beneficiary of the revenue obtained from carbon credit sales. Under such a scenario, the destruction facility is the active stakeholder in the carbon financing scheme, and both government and companies owning the stocks will be in a position to negotiate a reduced destruction price.

**e) Establishment of a ODS waste disposal infrastructure that can be used by other countries in the Middle Eastern Region**

Throughout implementation of the project the Lebanese government will, with the support of UNIDO, engage in a consultative process to assess the possibility of making special provisions to allow the import of unwanted ODS into the country for the purpose of destruction. This would require some amount of supervision and checking to ensure that there is no placing of the ODS waste in the market, but if done, it will provide additional arguments to substantiate the sustainability of the project because there is no other facility in the region.