

10 points on the subject of Styropor and on the disposal options for polystyrene insulation boards containing HBCD from the construction sector:

1. There is
 - **EPS polystyrene** (expanded polystyrene). This is white, grey or grey-white and coarse-pored.
 - and **XPS polystyrene** (extruded polystyrene). XPS polystyrene comes in different colours (e.g. light blue, pink, green, purple, yellow), has a slightly higher density than EPS polystyrene and is also fine-pored.
2. **Waste sources** are renovation and restoration work on facades, cellars, roofs or floor slabs of buildings (Attention: **NO packaging polystyrene**).
3. According to the **POP Waste Supervision Ordinance**, insulation materials made of polystyrene are permanently classified as **non-hazardous waste** (AVV No. 170604 Insulation material, with the exception of that covered by 170601 and 170603) as of 1 August 2017. By way of derogation, insulation materials made of **XPS polystyrene are classified as hazardous waste** (insulation material containing hazardous substances, AVV No. 170603) if **CFCs or HCFCs were used** as blowing agents, which occurred up to a maximum of 2002, and the concentration in the material is above 1,000 mg/kg. There is no health hazard when handling the substances as there is, for example, with asbestos or CMF. The primary concern is the environmental hazard of these pollutants.
4. The POP Waste Transfer Ordinance also imposes a **verification obligation** for waste classified as non-hazardous. This means that **transfer notes** or **consignment notes** must be issued by the producer, transporter and disposer. If possible, these should be issued electronically, indicating the correct waste producer number. Transfer notes in paper form are possible, but must be forwarded to NE 4 for waste register management.
5. The method of choice is the **collective disposal of small quantities** (<20 t/a per AVV number and waste producer number) via the **framework agreement** with KA 4 Schadstoffentfernung GmbH, Florastr. 8, 12163 Berlin, tel. +49030 79016518, e-mail: ka4@snafu.de.
6. If **larger quantities** are to be disposed of, please plan the disposal route in direct contact with me. Since polystyrene waste is now (mostly) a non-hazardous waste, the small quantity restriction of 20 t/a per waste producer number no longer applies and **larger quantities** can thus also be disposed of via **collective disposal**.
7. In the case of **composite material** (e.g. with roofing felt), the materials should be separated on site as far as technically possible so that they can then be disposed of separately. If separation is not possible or reasonable, the composite material can also be disposed of as non-hazardous waste (AVV No. 170904 Mixed construction and demolition waste).
8. **Analyses for the content of pollutants** can be omitted for EPS-Polystyrene and are only necessary for XPS if it is to be feared that CFCs or HCFCs are also contained. An analysis can also be useful if one has the justified hope that the material is not contaminated with these pollutants and wants to prove this.
9. For those who are particularly interested: The **disposal route** for these insulation materials will be as follows in future: Pre-treatment by compacting (currently only in two pre-treatment plants in Berlin: Grunske and Holzkontor) or shredding with gas extraction in case of CFC or HCFC contamination (Remondis) and subsequent incineration in a household waste or hazardous waste incineration plant.
10. More detailed information, in particular on the treatment plants, can be found at SBB mbH at https://www.sbb-mbh.de/fileadmin/media/publikationen/merkblaetter/merkblatt_hbcd_2017.pdf