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**COMMITTEE OF EXPERTS ON THE TRANSPORT
OF DANGEROUS GOODS**

**Sub-Committee of Experts on the
Transport of Dangerous Goods**
(Eighteenth session, 3-14 July 2000,
agenda item 5 (a))

**MISCELLANEOUS DRAFT AMENDMENTS TO THE MODEL REGULATIONS
ON THE TRANSPORT OF DANGEROUS GOODS**

Listing and classification

Transport of PCBs

Transmitted by the expert from the United States of America

Background

Polychlorinated biphenyls (PCBs), UN 2315, are listed in the dangerous goods list as a Class 9, PG II substance. Currently there is no indication of a threshold concentration where waste mixtures containing PCBs are no longer subject to regulation. The question of what threshold concentration should be used is raised frequently. Furthermore, wastes frequently contain very low levels of PCBs. It would not appear that these wastes containing low concentrations of PCBs warrant the same degree of regulation as the pure substance.

PCBs are listed in the UN Model Regulations due to the threat they pose on release to the environment. United States of America hazardous waste regulations specify that wastes containing less than 50 ppm of PCBs are not subject to hazardous waste regulations. It is proposed that mixtures of PCBs in concentrations of less than 50 ppm not be subject to the Recommendations.

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It would also seem reasonable that some small quantities of PCBs should be exempted from the regulations entirely. The expert from the United States believes that this quantity limit should be based on the quantity of PCB present in the package, not the total quantity of waste in the package. For example, a waste containing 50 ppm of PCBs with a mass of 20,000 kg would contain about 0.7 litres of PCBs. Under current United States transport regulations, packages containing less than 0.45 kg of PCBs are not subject to regulation. Noting that the Subcommittee at its last session agreed to a 1 litre limited quantity limit for PCBs, it is proposed that when a package contains less than 100ml of PCB that the package be considered as not subject to the regulations.

Proposal:

For the UN 2315 entry, add the following new special provision XXX to column (6) of the dangerous goods list:

XXX Mixtures of polychlorinated biphenyls are not subject to the requirements of these regulations when in concentrations of not more than 50 ppm. Packages containing less than 100 ml of polychlorinated biphenyls are not subject to the requirements of these regulations.
