

## **Economic Commission for Europe**

### **Inland Transport Committee**

#### **Working Party on the Transport of Dangerous Goods**

##### **Joint Meeting of the RID Committee of Experts and the**

##### **Working Party on the Transport of Dangerous Goods**

Bern, 22–26 March 2010

Item 5 (a) of the provisional agenda

**Proposals for amendments to RID/ADR/ADN: pending issues**

### **Comments on doc. ECE/TRANS/WP.15/AC.1/2009/29 (FEAD)**

#### **Soils and construction and demolition waste contaminated with PCBs**

##### **Transmitted by the Government of Portugal**

##### **Introduction**

1. As pointed out by FEAD in its document (ECE/TRANS/WP.15/AC.1/2009/29) “in the context of soil sanitation and site remediation, some consignments may include solid waste contaminated with PCBs with concentrations higher than 1000 ppm”.

2. As explained by FEAD “the reference to VV15 was drafted in the past (2005) for the following UN-numbers: UN 2315, UN 3151, UN 3152 and UN 3432”. But according to FEAD VV15 was developed for solids and not for liquids.

FEAD presents two proposals:

3. To delete provision VV15 for UN 2315 and UN 3151.

4. FEAD proposes also to “change the maximum concentration in VV15 from 1000 ppm in 5 %”, since allegedly the raise of the concentration has no negative impact on the environment.

##### **Comments**

5. As to the first part of FEAD proposal we can agree despite the fact that PCBs can be found in heat transfer fluids, lubricants or paints, for example. However we are dealing with polluted soils.

6. As to the question of raising the concentration of PCB in soils transported in bulk we have consulted the “Guidelines for the identification of PCBs and materials containing PCBs (United Nations Environment Programme, 1999), and based on these guidelines we have the following opinion.

7. VV15 states that “carriage in bulk is permitted in closed or sheeted vehicles, closed containers or sheeted large containers with complete walls for substances or mixtures (such as preparations or wastes) containing not more than 1000 mg/kg of substance to which this UN no is assigned”.

8. It is said in UN Guidelines for PCBs that 0.1 percent by weight of PCB it is “benchmark level for PCB regulation”. The example given says also that “0.1 percent by weight = 1000 ppm”.

9. It is hard to understand why FEAD wants to raise the level of “maximum concentration” in VV15 from 0.1 % by weight to 5% by weight (50 times more above the “benchmark level” pointed out in the UN Guidelines for PCBs).

## **Conclusions**

10. We are favorable to the first proposal by FEAD as to delete provision VV15 for UN 2315 and UN 3151.

11. For this reason we cannot accept without further explanation why we should pass the “maximum concentration” from 1000 mg/kg to 5% in special provision VV15. It is better to leave VV15 as it is now.

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