

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

Comment on document 2009/29 of the European Federation of Waste Management and Environmental Services (FEAD)

Soils and construction and demolition waste contaminated with PCBs

Transmitted by the Government of Switzerland

Introduction

1. A bulk transport company has asked the Swiss competent authority for permission to carry solid waste contaminated with PCB with a concentration higher than 1000 ppm.
2. After a thorough examination of the situation the competent authority agreed to authorize the bulk transport on the Swiss territory by considering following arguments:
 - Conforming to the requirements according to P001, P002, P906 or IBC 08 would lead to a very intensive manipulation and packaging activity resulting in exposing personnel to higher risks,
 - Mixing contaminated with non contaminated material to meet the 1000 ppm level would be in total contradiction with the objective of rehabilitating contaminated areas. Moreover a federal ordinance on waste treatment prohibits such practices in Switzerland,
 - One of the reasons to put a limit of concentration in the regulation is to prevent the transport of large quantities of pure PCB.
3. Switzerland agrees to increase the limit from 1000 ppm to 5% (50 000 ppm). As such a limit can be only arbitrary and may need to be reconsidered in case by case, Switzerland proposes to add a sentence allowing higher values with the agreement of the competent authority.

Proposal

4. Change the maximum concentration in VV15/VW15 from 1000 ppm to 5% (proposal in paragraph 5 of ECE/TRANS/WP.15/AC.1/2009/29 unchanged).
5. Add a new sentence at the end of the first paragraph of VV15/VW15 to read:
“Higher concentrations may be agreed by the competent authority”.

Justification

6. A limit in concentration is needed as explained above. However, in special situations, allowing higher concentrations for a bulk transport might be safer than sticking to packing instructions.
-