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Working Party on the Transport of Dangerous Goods  
(Bern, 24-28 March 2003)

CARRIAGE OF PAINT RESIDUES (WASTE)

Submitted by the Government of the Netherlands \*/

**SUMMARY**

Analytical summary:

This document outlines a proposal to regulate the carriage of paint residues (waste) in a practical and safe way.

Action to be taken:

Add a new special provision 6XX to 3.3.1 and in column (6) of Table A in 3.2 against the entry of UN 3175

Related documents: none

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\*/ Circulated by the Central Office for International Carriage by Rail (OCTI) under the symbol OCTI/RID/GT-III/2003/23.

## **INTRODUCTION**

The Netherlands were asked by their industry to put a proposal to the RID/ADR Joint Meeting to facilitate the carriage of waste of paint residues (in paint packagings) according to international regulations of RID/ADR in both a practical and a safe way.

Nowadays the industry has problems with fulfilling the requirements with respect to classification and related transport conditions. A main problem concerns the classification of the waste. Should it be classified as a liquid (like UN No. 1263 of Class 3) or as a solid (like UN No. 3175 of Class 4.1)?

Because this kind of waste (a mixture of packaging residues, solidified paint and liquid residues) has a rather low flammable liquid risk (maximum 30% liquid paint), it could be justified to treat this waste as UN 3175 and, under rather similar transport conditions, in a rather similar way as has been done in special provision 216 of section 3.3.1 of RID/ADR.

The average quantity of liquid paint is 20 mass-%, the maximum quantity of liquid paint is 30 mass-%, and the liquid is mostly viscous. For this reason, it is considered that the hydraulic pressure test and leakproofness test, normally required for packagings containing liquids, are not necessary for this kind of transport. However, in practice, it is possible that some free liquid (paint) is part of the waste. To take account of this presence of free liquid, it is proposed to use leakproof UN-tested packagings/IBCs (not subject to a leakproofness test but tested as prepared for carriage). For carriage in bulk, it is proposed to use a leakproof container/vehicle as is prescribed in VW10/VV10 (applicable to UN 3243).

At the RID/ADR Joint Meeting in September 2002, the Netherlands have interviewed several delegates on this subject. Apart from existing national regulations for the carriage of waste in several countries (especially for the transport from households to depots), there is sympathy for a RID/ADR solution to regulate the carriage of waste of paint. Generally, a preference was expressed to assign this waste to UN 3175 for this kind of low risk carriage and to use leakproof UN tested packagings and to allow carriage in bulk in leakproof containers.

For the Netherlands, this proposal will facilitate the carriage from municipal depots and companies to central depots and to waste processing companies. In this part of the chain of carriage of waste, the paints are carried separately from aerosols, batteries, etc. The proposal will contribute to a uniform (inter)national solution for the carriage of waste of paint.

The allowance of flexible IBCs will meet a practical need to use them in combination with box pallets (overpacks).

The transport of waste of paints is not only executed nationally but also internationally. For example, yearly many thousands of tons of waste of paint residues from the Netherlands are transported to waste processing companies in Germany and Belgium.

## PROPOSAL

Add a new special provision 6XX to 3.3.1 and in column (6) of Table A in 3.2 against the entry of UN 3175, as follows:

6XX Waste consisting of packaging residues, solidified residues of UN No. 1263 PAINT and maximal 30% mass-% liquid residues of UN No. 1263 PAINT may be carried under this entry without first applying the classification criteria of Class 4.1.

The requirements for the transport of UN No. 3175 are applicable, except of provisions PP9 of 4.1.4.1, V11/W11 of 7.2.4 and VV3/VW3 of 7.3.3.

In addition, the following requirements are applicable:

- (a) Flexible IBCs of types 13H3, 13H4 and 13H5 may be used.
- (b) Tests shall be carried out on packagings including IBCs, prepared as for carriage, including liquid contents.
- (c) For carriage in bulk, sheeted vehicles / sheeted open wagons, movable roof wagons, closed containers or sheeted large containers with complete walls shall be used. The body of vehicles/wagons or containers shall be leakproof or rendered leakproof, for example by means of a suitable and sufficiently stout inner lining.
- (d) According to 5.4.1.1.3, the goods shall be declared in the consignment note/transport document as follows: "WASTE, UN 3175 SOLIDS CONTAINING FLAMMABLE LIQUID, N.O.S. (paint), 4.1, II"

## JUSTIFICATION

Safety: According to the risk presented by this waste of paint, measures are proposed to secure safety by means of using leakproof packagings and containers. In practice, this will lead to improvement of safety for this kind of carriage.

Feasibility: This proposal enhances a better and uniform application of rules of RID/ADR by the industry.

Enforceability: The inspections bodies will be in a better position to judge the enforceability of rules than on the basis of the existing regulations of RID/ADR.

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