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.