

## **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**

**21 February 2023**

Bern, 20 march-24 march 2023

Item 5 (b) of the provisional agenda

**Proposals for amendments to RID/ADR/ADN:  
new proposals**

### **Carriage in bulk of specific categories of wastes containing asbestos (UN n° 2590 and n° 2212)**

**Transmitted by the Government of France on behalf of the working  
group on the transport of waste**

#### **Introduction**

1. The working group on the transport of wastes has continued its work, and has examined inter alia the transport of wastes containing asbestos. France has accepted to present this informal document in relation with the last discussions in the working group on that subject.
2. The proposal is an evolution of the proposal contained in document ECE/TRANS/WP.15/AC.1/2020/57 that has been discussed and improved by the working group. The proposal is based in principle on an exemption that France has introduced in his own national regulation in relation with the carriage in bulk of wastes contaminated by free asbestos (UN 2590 and UN 2212) allowing the carriage in bulk of such wastes contained in “container-bags” inside a rigid bulk container. The system is implemented in France since 2019 at the satisfaction of authorities and operators, and shows very good safety record as well as practicability. The container bag ensures sifproofness and the rigid container ensures mechanical resistance. The new proposal also benefits from the experience gained during its application in France
3. The scope is limited to some wastes contaminated by asbestos that cannot be covered by special provision SP 168 and that cannot easily be packed in bags or IBCs. For example, building parts such as ceiling contaminated by dust of asbestos present on the roof of a building or big quantities of road demolition wastes. Although these items initially only contain immersed asbestos after demolition it is impossible to apply SP 168 because they produce dust when broken. It is difficult to follow packing provisions IBC08 as the size of those elements and the exposure of workers in the case of cutting of those elements is problematic due to an increase in exposure of workers contrary to the regulation of worker safety. Furthermore, some of these demolition sites are in public areas and an increased exposure of the population to dust may occur. In all other cases where these problems do not occur, the current provisions would continue to apply.
4. The working group, in general, was of the opinion that indeed some categories of such wastes couldn't be packed in IBC due to their size or volume and would benefit from being carried in bulk with specific provisions to ensure the safety of carriage operations.
5. It was agreed that the proposal could be presented in an informal document to the March 2023 session of the Joint Meeting. As the text is quite long this would give delegations more time to react before an official working document would be presented in September. The Joint Meeting is invited to comment on the proposal as appropriate. Depending on the comments a revised proposal could be submitted in September.

## Proposals

6. The five following proposals have been drafted to follow the logical structure of RID/ADR/ADN. They have been numbered to facilitate the discussion but they are part of a global systematic and need to be adopted as a whole.

### Proposal 1

Modify Table A in chapter 3.2 as follows:

(1)	(2)	(3a)	(3b)	(4)	(5)	(6)	(7a)	(7b)	(8)	(9a)	(9b)	(10)	(11)
2212	ASBESTOS, AMPHIBOLE (amosite, tremolite, actinolite, anthophyllite, crocidolite)	9	M1	II	9	168 274 542 SPxxx	1kg	E0	P002 IBC08	PP37 B4	MP10	T3	TP33
2590	ASBESTOS, CRYSTOTILE	9	M1	III	9	168 SPxxx	5kg	E1	P002 IBC08 R001	PP37 B4	MP 10	T1	TP33

(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)	(1)	(2)
SGAH	TU15	AT	2 (E)	V11	VC1 VC 2 APxx CVxx	CV1 CV13 CV28 CVxx	S19	90	2212	ASBESTOS, AMPHIBOLE (amosite, tremolite, actinolite, anthophyllite, crocidolite)
SGAH	TU15	AT	3 (C/E)	V5	VC1 VC 2 APxx CVxx	CV13 CV28 CVxx		90	2590	ASBESTOS, CRYSTOTILE

### Proposal 2

In Chapter 3.3: add the following new special provision:

“SPxxx: Wastes Objects and materials contaminated by free asbestos (UN Nos 2212 and 2590 not fixed or immersed in a binder in such a way that no escape of hazardous quantities of respirable asbestos can occur) may be carried under provisions of Chapter 7.3 provided that the following provisions are met:

- (a) The wastes are carried only from the site where those wastes are generated to a final disposal facility. Only intermediate storage operations, carried out without unloading or transfer of the containment system, between these two types of sites are authorised,
- (b) The wastes belong to one of these categories:
  - (i) Solid wastes from road works, including asphalt milling residues contaminated by free asbestos as well as their sweeping residues;
  - (ii) Soil contaminated by free asbestos;
  - (iii) Objects (e.g.; furniture...) contaminated by free asbestos from damaged structures or buildings;
  - (iv) Materials from damaged structures or building contaminated by free asbestos that cannot, due to their volume or mass, be packed in accordance with the packing instruction applicable to the UN number used (UN 2212 or UN 2590, as appropriate);
  - (v) Construction site wastes contaminated by free asbestos from buildings or structures during their demolition or rehabilitation, that cannot, due to their size or mass, be packed in accordance with the packing instruction applicable to the UN

number used (UN 2212 or UN 2590, as appropriate) These wastes contaminated with asbestos shall fall into the following categories only:

- - roofing and façade elements (roofing containing asbestos, bituminous coatings, insulation, structural parts, window frames, etc.);
- - ceilings elements;
- - floors and floor parts;
- - piping elements (including valves and fittings);
- - pipes and ducts;
- - fragments of partition walls;
- - fragments of concrete slabs.

(c) The wastes covered by these provisions shall not be mixed or loaded together with other wastes containing asbestos and any other wastes hazardous or not,

(d) Each transport shall be considered as a "full load" within the meaning of 1.2.1.

### Proposal 3

Add the following paragraph to Chapter 5.4

*“5.4.1.1.4: Special provisions for wastes contaminated by free asbestos (UN Nos 2212 and 2590) as mentioned in special provision xxx*

When special provision xxx is applied, the transport document shall bear the inscription “Transport according to special provision xxx”.

The description of the wastes carried in accordance with xxx (b) (i), (ii), (iii), (iv) and (v) shall be added to the dangerous goods description required in 5.4.1.1.1 (a) to (d) and (k). The transport document should also be accompanied by the following documents:

- (a) a copy of the data sheet for the type of container-bag used, with the letterhead of the manufacturer or distributor of the container-bags, mentioning the dimensions of this packaging and its maximum capacity in mass;
- (b) a copy of the unloading procedure conforming to CVxx, if applicable.”

### Proposal 4

Add a new provision APxx in 7.3.3.2.7 as follows:

“APxx Carriage in bulk is permitted for wastes provided the wastes are contained in a bag of the size of the load compartment, referred to as “container-bag “for the purpose of this provision. The container-bags shall consist of at least two liners. The inner liner shall be made dust-tight to prevent the release of dangerous quantities of asbestos fibres during transport. The inner liner shall be made of polyethylene or polypropylene film. The load compartment shall have metallic rigid walls of adequate strength for its intended use. The walls shall be high enough to completely hold the container-bag.

The outer cover shall be made of polypropylene and has a closing zip system. It ensures that the container-bag loaded with waste is mechanically resistant to the usual shocks and stresses during transport, in particular during the transfer of the skip loaded with container-bags between transport vehicles or between transport vehicles and warehouses.

Container-bags:

- (a) Shall be designed to resist puncturing or tearing by the contaminated waste or articles due to their angles or roughness.
- (b) Shall have a zip system which is sufficiently tight to prevent the release of dangerous quantities of asbestos fibres during transport. Lace-up or flap closures only are not permitted.

Provided that the container bag offers a similar protection, the sheet can be dispensed with when using VC1.

Objects contaminated by free asbestos from damaged structures or buildings, as well as construction site waste contaminated by free asbestos from structures or buildings during their demolition or rehabilitation as mentioned in special provision xxx (b) (iii), (iv), and (v), shall be transported in a container-bag with a second bag of the same type. The total mass of waste contained shall not exceed 7 tons.

In all cases, the maximum mass of waste shall not exceed the capacity specified by the container-bag manufacturer.”

### **Proposal 5**

Add a new additional provision CVxx to 7.5.11 “Additional provisions applicable to certain classes or specific goods” to read as follows:

“CVxx Only the following means of transport are authorised:

- for wastes from road works or the removal of asbestos-polluted soil: skips for public works or Ampliroll-type removable skips;
- for all other types of wastes: Ampliroll-type removable skips.

The skips shall not have any internal sharp edges (internal steps, etc.) that could tear the container- bag during unloading. The skips shall be checked before any loading operation.

The container-bags shall be placed in the skips for transport operations prior to any filling operation. The outer liner of the container-bags shall be positioned so that the gathering of the closing hooks is on the front side of the skip. After filling, the container-bags shall be closed in accordance with the manufacturer's instructions.

Once loaded the container-bags shall not be lifted or transferred from one skip to another. Several filled container-bags shall not be loaded in the same skip.

After any filling operation, and after they have been closed, the container-bags shall be decontaminated on their external surfaces.

The unloading of container-bags transported in Ampliroll-type removable skips shall be carried out with the skip placed on the ground.

The unloading of container-bags filled with wastes from road works or soil contaminated by free asbestos by tipping the skip is permitted, provided that an unloading protocol agreed jointly by the carrier and the consignee is complied with, to prevent the container-bags from tearing during unloading. The protocol shall ensure that the container-bags do not fall or break during the unloading operation.”

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