Fédération Européenne des Activités de la Dépollution et de l'Environnement
European Federation of Waste Management and Environmental Services
Europäische Föderation der Entsorgungswirtschaft

PROPOSAL FOR AMENDMENT TO ADR (Review 2011)
FEAD proposal on soils and construction and demolition waste contaminated with PCBs

24 February 2009

Soils and construction and demolition waste contaminated with PCBs

Introduction:

In the context of soil sanitation and site remediation, some consignments may include solid waste contaminated with PCBs with concentrations higher than 1000 ppm.
The reference to VV15 was drafted in the past (2005) for the following UN-numbers : UN 2315 polychlorinated biphenyls, UN 3151 polychlorinated biphenyls liquid, UN 3151 polychlorinated terphenyl liquid, UN 3152 polychlorinated biphenyls solid, UN 3152 polychlorinated terphenyl solid as initially introduced in the multilateral agreement M 137.
UN 3432 is being used for contaminated soils and for construction & demolition waste. As contaminated soils and construction & demolition waste are always solid waste, UN 3432 should refer to VV10, which guarantees the same level of safety as VV15 without limiting it to 1000 ppm.

Proposal:

Inclusion of specific provision under UN 3432:
VV10 can be used instead of VV15 for solid contaminated soils and construction and demolition waste contaminated with PCBs.

Justification:

Safety: VV10 is as stringent as VV15. The reclassification in VV10 of this type of waste will avoid additional manipulation like packaging in bags, drums and will therefore limit contamination to other waste. This type of transport is more adapted this type of waste. There are no safety implications.
As PCBs are not volatile and as the waste is described as being solid, this specific provision has no additional negative impact on the environment.

Feasibility: The waste management and transport sectors, as well as the public sector (mandatory clean up operations) are concerned by the proposed amendment. It is a clear and applicable provision. It is controllable. I will avoid unnecessary manipulation/packaging for waste, which is preferably treated in bulk.
No transitional period is required.

Enforceability: Enforceability can be observed and can be monitored by spot controls.

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