

**Observations and commentaries to the general technical guidelines on the environmentally sound management of wastes consisting of, containing or contaminated with persistent organic pollutants (POPs) - 22 February 2004 Draft.**

Text of the document	Observations and commentaries
In reference to section 4.7.3.1 Hazardous waste landfill the document indicates	For the number five, is necessary to establish that amount represents small quantity POP wastes (e.g., fluorescent light ballasts containing PCB; small containers of household pesticides).

**Observations and commentaries to the Technical Guideline for Environmentally Sound Management of Wastes Consisting of, Containing or Contaminated with Polychlorinated biphenyls (PCB), Polychlorinated terphenyls (PCT), and Polybrominated biphenyls (PBB) - 15 may 2004 draft.**

Text of the document	Observations and commentaries
In reference to section 1.2.1.1 PCB the document indicates: ... higher chlorinated PCB congeners are virtually insoluble in water and very resistant to thermal and biological degradation.	The document could indicate: ... higher chlorinated PCB congeners are virtually insoluble in water and very resistant to thermal, chemical and biological degradation. Maybe is the same for the points 1.2.1.2 & 1.2.1.3.
In reference to section 1.2.4 Wastes the document indicates the PCB, PCT and PBB wastes are found in a number of physical forms including:	The document could indicate in the list the containers or barrels containing or contaminated that store equipment or material containing or contaminated with PCB, PCT & PBB.
In reference to section 4.2 Legislative and regulatory framework the document indicates, the elements of a regulatory framework applicable to PCB, PCT and PBB	The document could be indicate the relative prohibition to reduce of the concentration of the PCB, PCT & PBB by means of you practice like the <u>dilution</u> of the concentration or the contaminated washing of the equipment and materials with PCB, PCT & PBB the previous idea will allow to reduce the generation of wastes. The practice of <u>dilution</u> is different to the solvent washing, the solvent washing remove or decontaminate some electrical equipment or soils. It is even possible to adhere another prohibition to legislation of the countries that could be that it is not allowed to confine in sanitary fillings (landfills) the PCB, PCT & PBB or their remainders if they do not count on a concentration below regulatory limits (once the residue has been tested to be non-hazardous). Do not allow that the PCB, PCT & PBB could be subjected to disposal operations that may lead to recovery, recycling, reclamation, direct reuse or alternative uses of them.
In reference to section 4.4 2 Inventory the document indicates that the development of a national inventory requires the long-term commitment of the national government, cooperation of PCB, PCT and PBB owners, and a sound administrative process for collection of information on an ongoing basis, storage of the information in a computer database and preparation of useful reports regarding the progress of phase-out and disposal. In some cases, government regulations may be required to ensure that PCB, PCT and PBB owners report their holdings and	In the Mexican experience, the cooperation of the owners it has been fundamental to conform the partial inventory of PCB, nevertheless is necessary that the laws of each country insist periodically to them to declare the possession of the PCB, PCT & PBB so that the inventories are dynamics.  It's important to emphasize that the PCB, PCT & PBB inventory must show the potential equipment contaminated with PCB installed in the distribution network of electrical energy (Sensitive Sites).

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cooperate with government inspectors.	
In reference to section 4.5.1 Sampling the document indicates The types of matrices that are sampled for analysis of PCB, PCT and PBB;	We thought that for the Solids list, we could include to the ceramic materials and wood.
The section 4.6 Handling, collection, packaging, labelling, transportation and storage.	<p>We thought that to make collection, packaging, labeling, transportation and storage of the PCB, PCT &amp; PBB clearly norms are due to know that they observe the minimum international regulations to reduce the associated risks to the handling.</p> <p>Staff should be trained in the correct methods for handling hazardous wastes and they must to use the personal security or protective equipment necessary to make the activities.</p>
In reference to section 4.7.4.1 Hazardous waste landfill the document indicates	For the number V, Is necessary to establish that amount represents small quantity PCB, PCT & PBB wastes (e.g., fluorescent light ballasts containing PCB).