

Assignment to an AVV¹ entry according to the content of PAHs²

In the past tar-containing roofing felts / roofing papers (Proof by detection of PAHs) were used in many cases for the insulation of roofs. The production of roofing felts by using coal tar pitch had been ceased in the year 1962. Over time, the tar-containing roofing felts have been replaced by bitumen-based products. Waste from roofing papers from roofs constructed until the mid-1960s can initially be assumed as hazardous, due to the carcinogenic coal tar pitches, used at the time.

In this regard it is crucial, if the waste either reaches or exceeds the concentration of 0,1% (1000 mg/kg) coal tar pitch; to classify the waste as hazardous.

1000 mg/kg of coal tar pitch are represented by 400 mg/kg of EPA-PAHs³.

If around 400 mg EPA-PAH per kg waste analysis are found by analysis, it can be assumed that the concentration of coal tar pitch in the original waste sample exceeds 1000mg/kg or 0,1%.

In the state of Hesse roofing felts containing more than 400 mg/kg EPA-PAHs are assigned to the AVV entry **17 03 03*** (Coal tar and tarred products) as hazardous waste.

For materials, which are clearly more recent and/or definitely without older or suspicious layers, analysis for PAHs are not necessary.

Such roofing felts should be classified to the AVV entry **17 03 02** (Bituminous mixtures other than those mentioned in 17 03 01) and disposed as non-hazardous waste.

¹ Abbr. for „Abfallverzeichnis-Verordnung“, translated: German Waste Catalogue Ordinance. Entries and designations of the AVV comply with those of the European list of wastes (Decision 2000/532/EC)

² polycyclic aromatic hydrocarbons

³ a list of 16 different PAHs compiled by the American EPA (Environmental Protection Agency)