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► **To cite this version:**

Pierre Hennebert, Nicolas Humez, Isabelle Conche, Ian Bishop, Flore Rebischung. Assessment of four calculation methods proposed by the EC for waste hazardous property HP 14 ‘Ecotoxic’. Waste Management, Elsevier, 2016, 48, pp.24-33. <10.1016/j.wasman.2015.11.044>. <ineris-01276110>

HAL Id: ineris-01276110

<https://hal-ineris.archives-ouvertes.fr/ineris-01276110>

Submitted on 29 Feb 2016

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Assessment of four calculation methods proposed by the EC for waste hazardous property HP 14 ‘Ecotoxic’

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Keywords: ecotoxicity, HP 14, M-factors, European List of Waste

Waste Management 48 (2016) 24–33

1. ABSTRACT

Legislation published in December 2014 revised both the List of Waste (LoW) and amended Appendix III of the revised Waste Framework Directive 2008/98/EC; the latter redefined hazardous properties HP 1 to HP 13 and HP 15 but left the assessment of HP 14 unchanged to allow time for the Directorate General of the Environment of the European Commission to complete a study that is examining the impacts of four different calculation methods for the assessment of HP 14. This paper is a contribution to the assessment of the four calculation methods. It also includes the results of a fifth calculation method; referred to as “Method 2 with extended M-factors”.

Two sets of data were utilised in the assessment; the first (Data Set #1) comprised analytical data for 32 different waste streams (16 hazardous (H), 9 non-hazardous (NH) and 7 mirror entries, as classified by the LoW) while the second data set (Data Set #2), supplied by the eco industries, comprised analytical data for 88 waste streams, all classified as hazardous (H) by the LoW.

Two approaches were used to assess the five calculation methods.

The first approach assessed the relative ranking of the five calculation methods by the frequency of their classification of waste streams as H. The relative ranking of the five methods (from most severe to less severe) is: Method 3 > Method 1 > Method 2 with extended M-factors > Method 2 > Method 4. This reflects the arithmetic ranking of the concentration limits of each method when

assuming $M=10$, and is independent of the waste streams, or the H/NH/Mirror status of the waste streams.

A second approach is the absolute matching or concordance with the LoW. The LoW is taken as a reference method and the H wastes are all supposed to be HP 14. This point is discussed in the paper. The concordance for one calculation method is established by the number of wastes with identical classification by the considered calculation method and the LoW (i.e. H to H, NH to NH). The discordance is established as well, that is when the waste is classified “H” in the LoW and “NH” by calculation (i.e. an under-estimation of the hazard). For Data Set #1, Method 2 with extended M-factors matches best with the LoW (80% concordant H and non-H by LoW, and 13% discordant for H waste by LoW). This method more correctly classifies wastes containing substances with high ecotoxicity. Methods 1 and 3 have nearly as good matches (76% and 72% concordant H and non-H by LoW, and 13% and 6% respectively discordant for H waste by LoW). Method 2 with extended M-factors, but limited to the M-factors published in the CLP has insufficient concordance (64% concordant H and non-H by LoW, and 50% discordant for H waste by LoW). As the same method with extended M-factors gives the best performance, the lower performance is due to the limited set of M-factors in the CLP. Method 4 is divergent (60% concordant H and non-H by LoW, and 56% discordant for H waste by LoW).

For Data Set #2, Methods 2 and 4 do not correctly classify 24 air pollution control residues from incineration 19 01 07* (3/24 and 2/24 respectively), and should not be used, while Methods 3, 1 and 2 with extended M-factors successfully classify 100% of them as hazardous. From the two sets of data, Method 2 with extended M-factors (corresponding more closely to the CLP methods used for products) matches best with the LoW when the LoW code is safely known, and Method 3 and 1 will deviate from the LoW if the samples contain substances with high ecotoxicity (in particular PAHs). Methods 2 and 4 are not recommended. Formally, this conclusion depends on the waste streams that are used for the comparison of methods and the relevancy of the classification as hazardous for ecotoxicity in the LoW. Since the set is large (120 waste streams) and no selection has been made here in the available data, the conclusion should be robust.

2. INTRODUCTION

In 2014, the Member States of the European Union updated the European List of Wastes (LoW) and defined the 15 hazard properties (HP) of wastes with the exception of HP 14 ‘Ecotoxic’ (EC 2014a, b). This hazard property is the most frequent classifying property as hazardous for waste (Hennebert et al. 2014) if the Classification, Labelling and Packaging of Preparation and Mixtures calculation method (CLP Regulation 2008), limited to the first two levels of chronic ecotoxicity, but including extended M-factors, is used.

To review the different approaches to the assessment of HP 14, (based on the chemical analysis of waste streams), the Directorate General of the Environment of the European Commission’s commissioned an assessment of four calculation methods (Call for Tenders: DG ENV 2014). The four methods differ due to the varying application of hazard statement codes, concentration limits and M-factors.

The assessment of the methods is focused on the so-called “mirror entries” in the LoW, that is waste that can be either hazardous or non-hazardous; those that must be assessed for their hazardous properties based on their chemical composition or by biological testing. With “mirror entries”, the result of the Call for Tenders will be limited to a ranking of the four methods by their frequency of classification, which is the arithmetic value of their limits of concentration. This ranking, depending on the M-factors, is presented below.

This paper is a contribution to the assessment of these four calculation methods, combined with the presentation of a fifth method that applies “extended M-factors”, i.e. M-factors calculated from reviewed EC50 and NOEC data for a broader range of inorganic and organic substances, including substances important in waste, like the polyaromatic hydrocarbons (PAHs). Using only the “absolute entries” of the LoW as a reference, and applying the five different classification methods, the methods can be ranked by seeing how closely the results match the LoW classification. To use the LoW as a reference method is a choice of this paper. The correctness of this choice can be argued but we have not found another method. The LoW and hazardous waste classification is political and complex due to links to the CLP (no clear right or wrong approach). Some broader questions as the relevance of the LoW and the speciation of the metallic compounds for proper classification are highlighted. A list of M-factors is proposed.

3. MATERIAL AND METHODS

3.1 Calculation methods for HP 14, and justification of a method with extended M-factors

The different calculation methods (named Method 1 to 4) in the Call for Tenders are:

- **Method 1:**
 $\Sigma c H400 \geq 25 \%$, or $(100 \times \Sigma c H410) + (10 \times \Sigma c H411) + (\Sigma c H412) \geq 25 \%$, or
 $\Sigma c H410 + \Sigma c H411 + \Sigma c H412 + \Sigma c H413 \geq 25 \%$
- **Method 2:**
 $\Sigma (c H400 \times M) \geq 25 \%$, or $\Sigma (M \times 10 \times c H410) + \Sigma c H411 \geq 25 \%$
The cut-off value for consideration in an assessment for Aquatic Acute 1 and Aquatic Chronic 1 is 0.1/M %; and for Aquatic Chronic 2 is 1%.
The M-factors will be determined as follows:
For substances for which M-factors have been established in Table 3.1, Annex VI of the CLP Regulation, those multiplying factors shall apply.
For substances for which no M-factors have been established in Annex VI, a multiplying factor $M = 1$ shall apply.
- **Method 3:**
 $\Sigma c H410 \geq 0.1 \%$, or $\Sigma c H411 \geq 2.5 \%$, or $\Sigma c H412 \geq 25 \%$, or $\Sigma c H413 \geq 25 \%$
- **Method 4:**
 $\Sigma (M \times c H410) \geq 2.5 \%$, or $\Sigma c H411 \geq 25 \%$
The M-factors will be determined as per Method 2.

For easier comparison, these methods are presented at Table 1. For each method, each rule of classification is written as a column in the table. To assess HP 14, each concentration of a substance with the hazard statement code must be divided by concentration limit specified in the table, and the ratios must be summed. The sum of these ratios is a hazard index. If it is ≥ 1 , the waste is hazardous for this rule of classification. If it is <1 , the waste is considered as non-hazardous for that rule.

Table 1

We have also assessed a fifth method (named “Method 2 with extended M-factors”). The limitation of hazard assessment to chronic ecotoxicity of level 1 and 2 (not taking into account level 3 of CLP – level 4 is presented as a “safety net” in the CLP) for waste is argued by an impact assessment (Hennebert and Rebishung, 2012). Another reason is that there is only one final level of hazard for waste (i.e. Hazardous) but there are 4 levels of hazard for products (Ecotoxic acute, Ecotoxic chronic level 1, 2, 3). This approach (Method 2 with extended M-factors) has been used in France since 2012.

Calculations written in Excel were used to assess Data Set #1 against the five methods, while the on-line hazardous waste classification software HazWasteOnline™ (www.hazwasteonline.com) was used to analyse Data Set #2.

The LoW is taken in this paper as the reference method. This implies that the wastes used in the LoW are all classified as hazardous for HP 14. In practice, this cannot be established with absolute certainty. There is no account of how various types of waste with absolute entries in the

LoW have been allocated as hazardous or non-hazardous. There is no information available about how waste has been classified as hazardous or non-hazardous in LoW, and in particular for HP 14. The match or concordance for a given calculation method is established by the number of wastes with a classification identical to the LoW (H/H, NH/NH). The discordance is established as well and the case where the waste is classified “H” in the LoW and “NH” by calculation (under-estimation of the hazard) will also be considered. Erroneous classification of non-hazardous waste as hazardous can also be problematic, but, for the clarity of the paper, will not be handled here.

3.2 Waste and Waste composition data

Data Set #1 has 32 different waste streams with known LoW codes . For three wastes with mirror entries, an entry has been chosen based on independent information. The bauxite residue (waste stream #46) has been washed and dried in press filter and amended with gypsum to bring the pH to 8.5, to allow plants to grow on it (Hennebert et al. 2014). For this waste stream, the non-hazardous mirror entry code has been used. In contrast, for two sulfidic mine tailings waste streams (#64 and #66), that have been without vegetation for 60 years and produce acid mine drainage (pH 3.5 and 2.8), the hazardous mirror entry has been selected. Most of the wastes have been analysed according to AFNOR XP X30-489 “Determination of elements and substances in waste” which is being discussed as a European standardization Work Item submitted to formal vote (CEN/TC 292 2015). This approach will give a reasonable approximation as to the composition of the waste undergoing hazardous waste classification and can also be used for Seveso classification, Water Framework Directive classification, transport regulation, and occupational health and safety requirements. Please be aware that hazard classification with incomplete analytical data is misleading.

For Data Set #1, the analytical mass balances (sum of all measured concentrations) were better than 90%. Some of these wastes were presented in Hennebert et al. (2013). When the concentration of a substance is below its limit of quantification (LOQ), the LOQ has been used as the concentration. The concentrations are expressed in terms of dry matter for solid waste and on raw mass (including water) for liquid waste. The hazard indexes can be expressed on dry matter or on raw mass by conversion using the relevant moisture content correction.

Data Set #2 comprises a set of laboratory results from 88 different waste streams. The original analytical data were supplied by the professional body representing the French eco-industries (SYVED, SYPRED, CNPA). The 88 waste streams have been analysed exhaustively (AFNOR XP X30-489) but for practical reasons only results for volatile and semi-volatile compounds,

petroleum products, and heavy metals are used here (not PAH concentrations). Among these, results for 208 substances have been excluded from the assessment because they are not documented in the CLP. The mass balance for the remaining analysed concentrations has a mean value of 7.8 % (with one sample reaching 78%), covering 179 substances and metals (including 13 heavy metals) where they were detected. Across the whole of Data Set #2, there were only 34 common substances (including the 13 metals). The classification results presented below are hence not “absolute” results, but they can be used to compare the calculation methods.

3.3 Speciation of mineral elements to mineral substances

In waste, classification by chemical composition depends in part on the hypothesis of speciation of the different metals into the concentrations of actual metal compounds. Chemical classification is routinely hampered by this speciation question. Where the CLP is mainly focused on chemicals and formulations consisting of pure substances and mixtures of pure substances, the waste regulation covers a wide range of materials which are typically poorly defined in terms of the exact chemical form of the substances that they contain. Lack of information on the chemical form of a metal required for speciation can lead to the use of “worst case” metal compound, which is a poor measure of hazardousness, and a possible classification as hazardous (Hennebert and Weltens, 2014). A presentation of the different available methods with a step-wise method (depending on the concentration of the metal) can be found in AFNOR FD X30-494 (2015) and in an Annex of Hennebert and Rebischung (2015).

A first step to avoid expensive speciation work is to use “worst case with information” approach, i.e. 1) to suppose that a particular metal is in its most hazardous form in the waste, and 2) that it can realistically be present in the waste. “Simple” metal compounds with only one ecotoxic element are used rather than more complex metal compounds (i.e. sodium chromate instead of lead chromate). A list of such substances can be found for all HPs in Hennebert and Rebischung (2015). That list has been used here for HP 14. For the 12 heavy metals, the species used here are presented at Tables 7.1 and 7.2

It must be remembered that the “exact” classification of one waste stream should not use the total content of metal with the worst case compound, but the content of each metallic compound (silicate, embedded species as catalyst in a polymer matrix, soluble forms...) and its hazard statement code. In particular, CLP addresses aquatic ecotoxicity, and terrestrial ecotoxicity is not assessed. For ecotoxicity, according to ECHA’s Guidance on the application of the CLP criteria (2011), a substance must be dissolved (in water) in order to be available for an ecotoxicological response or to migrate into the environment and subsequently pose a potential hazard.

For the purpose of this paper (Which method matches best with the LoW?), those considerations are not a major obstacle.

3.4 M-factors

In the CLP, multiplying factors for the concentrations of the substances that produce biological effects in tests at concentration < 1 mg/L are used to calculate the hazard for the aquatic environment. Table 3.1 of Annex VI of the CLP has a (limited) list of M-factors. The M-factors should be calculated for each substance for acute toxicity (depending on the concentration having 50% of biological effect (EC50) if it is < 1 mg/L, < 0.1 mg/L, < 0.01 mg/L, ...) and for chronic ecotoxicity (depending on the concentration with no observed effect (NOEC) if it is < 0.1 mg/L, < 0.01 mg/L, < 0.001 mg/L, ...) (CLP 2008 ATP 02). Tables of M-factors can be found in Hennebert and Rebischung (2013, updated in 2015).

3.5. Arithmetic comparison of the calculation methods for HP 14

To give an insight about the proposition of DG ENV 2014 and the proposition of a fifth method, the five calculation methods can tentatively be classified by increasing concentration limit, taking into account the following observations:

a. A waste classified as acute ecotoxic is also classified as chronic ecotoxic (empirical result not presented for this set of data, other data in Hennebert et al., 2014). The reverse is not true. This statement cannot be verified if the waste contains hazardous degradable substances that have an acute M-factor greater than a chronic M-factor. This is the case for some PAH: benzo[k]fluoranthene, $M_{\text{acute}} = 100$, $M_{\text{chronic}} = 10$; anthracene, 100 and 10 respectively; fluoranthene, 100 and 10; pyrene, 10 and 10; phenanthrene, 10 and 1. Excepted for these cases, the comparison of methods may therefore be limited to chronic ecotoxicity;

b. References to hazard statement codes H412 and H413 do not play a practical role in the classification of waste, because the cumulative concentrations must achieve 25% and such concentrations are unlikely to be present in the waste. The number of substances with these hazard statements codes in Table 3.1 of Annex VI CLP (H412: 431 substances, and H413: 254 substances) for H412 are mainly related to synthetic organic chemicals and the minerals tin chloride and powdered nickel (excluding rare substances), and for H413, elements and substances containing Ni, Co, Se, U, Tl and cadmium sulfide. With a 25% cumulative concentration, these materials will not be *a priori* material that the waste holder wishes to

discard, but rather a resource which the holder will seek to use due to their technical or commercial value. Comparing methods can therefore be confined to the limits of concentration of H410 and H411 substances;

c. The arithmetic ranking concentration limits of the five calculation methods for chronic ecotoxicity H410 and H411 depend on the value of the chronic M-factor. If a mean chronic M-factor is hypothesized, and if that M-factor is in the CLP Annex VI, a classification by increasing concentration limit can be set (Table 2). The exact classification will depend on the presence of substances with chronic M-factor > 10. The rank of Methods 2 and 4 can in that case move upwards.

d. For hazardous metal compounds and other substances, Annex VI of CLP contains only M-factors for pesticides and nickel compounds. For other metals and substances and mixtures of them, the producer must provide ecotoxicological data and self-classification (including M-factors) to register its product in the REACH inventory. Reviewed tables of M-factors are given in this paper. A comparison of concentration limits for heavy metals and PAHs (frequently encountered in waste) with or without M-factors is given in Table 3.

If one waste contains As, Co, Cr(VI), Cu, Pb, Zn and PAHs, the ranking of the methods will be (from most severe to less severe): Method 3 > Method 1 = Method 2 with extended M-factors > Method 2 > Method 4.

If one waste contains in addition, significant concentrations of Hg and Cd, the ranking of the methods will be: Method 2 with extended M-factors > Method 3 > Method 1 > Method 2 > Method 4.

Table 2

Table 3

4. RESULTS AND DISCUSSION

Classification of Data Set #1

The results for the 32 waste streams are presented at Table 4, ordered by method with decreasing corresponding score with the LoW. The scores are presented in Table 5.

Table 4

Table 5

One criterion to measure the relative ranking of the five calculation methods can be to assess the number of waste streams that each method classifies as hazardous. The order (Table 5) is Method 3 (25/32) > Method 1 (21/32) > Method 2 with extended M-factors (20/32) > Method 2 (12/32) > Method 4 (10/32). This result corresponds to the arithmetic ranking by concentration limits for chronic ecotoxicity in case of mean M=10 (Table 2).

A more complete approach is to look for “absolute” matching of both H and NH waste (Table5). Method 2 with extended M-factors is the most concordant and second best (equal with Method 1) in terms of not matching the LoW entry.

The other calculation methods then rank in the order of concentration limits set forth above, with decreasing performance.

Methods 1 and 3 are in good agreement with the LoW. They have low concentration limits (Method 1: 0.25%; Method 3: 0.1%) but do not classify correctly in relation to the LoW for wastes containing substances with high chronic M-factors (> 10), in particular:

- Metals: compounds of Hg and Cd (chronic M = 100)
- Organic substances: PAHs and pesticides (chronic M = 100 to > 1000).

The wastes that may contain these substances are wastes from the chemical or metallurgical industry, petroleum products and combustion residues, pesticides packaging, and soils, sludges and contaminated sediments. Only some of the wastes were analysed for PAHs, which explains the differences in ranking.

In Data Set #1, there is a PAH, benz(a)anthracene in waste stream #28, and a pesticide, chlorpyrifos, in waste stream #19.

Method 2, which utilises only the harmonized M-factors published in the CLP, is less concordant (i.e. lower ranking). As the same method with extended M-factors gives the best performance, the poorer performance of this method clearly comes from the limited set of M-factors.

Method 4 is poorly concordant or even divergent.

Classification of Data Set #2

The 88 waste streams in Data Set #2 are representative of the main industrial hazardous waste streams in Europe (Table 6). The assumptions used to assess the chemistry of these waste streams are the usual ones, either assuming a standard composition or a composition based on a particular treatment process and are not necessarily chemically exact. The number of entries in the LoW per waste type is presented in Table 6. Waste from incineration processes are specifically identified (corresponding to one entry in the LoW), but the other wastes are mixtures of different wastes, created during collection and treatment processes (corresponding to as many as 142 entries in the LoW). All the entries are hazardous. All the wastes of this data set are therefore classified by the LoW as hazardous. It is not known which entries were classified as hazardous due to just the hazard property 'ecotoxic' or for any other hazard property (e.g. HP 7 carcinogenic). The number of waste streams classified as hazardous by each method is also presented in Table 6.

Solid wastes are more frequently classified as hazardous than are liquid wastes. If the number of LoW entries increases (waste streams originating from other industries or processes), the frequency of a hazardous outcome decreases. While some liquid wastes are not classified, the most classified liquid wastes are engine oils, hydraulic oils and halogenated solvents.

The methods are ranked in Table 6 by decreasing number of samples classified as hazardous: Method 3 > Method 1 > Method 2 with extended M-factors > Method 2 > Method 4. This result corresponds to the arithmetic ranking by concentration limits for chronic ecotoxicity in case of mean M=10 (Table 2).

The six incineration waste types (24 waste streams) are air pollution residues (APC) from industrial or municipal solid waste incineration (MSWI). They have a highly soluble fraction and contain heavy metals epurated from the fumes. They correspond to 19 01 07*. They are recognized by experts as ecotoxic and have received a hazardous entry in the LoW due to (in part) this ecotoxic hazard. Methods 3, 1 and 2 with extended M-factors successfully classify these 24 waste streams as hazardous. Methods 2 and 4 fail to classify them as hazardous, and should not be used.

The remaining Method 3, 1 and 2 with extended M-factors give exactly the same assessment results except for four of the waste streams: packages and materials, organic pasty waste, hydrocarbons for incineration and halogenated solvents. For these 33 waste streams, Method 1 classifies 22 of them as hazardous, Method 3 classifies 15, and Method 2 with extended M-factors classifies 12 of them as hazardous. The analytical data are from different waste streams (many LoW entries) and it is not known as to the extent by which they have been classified as ecotoxic by experts establishing the LoW and/or by the other hazard properties.

Table 6

Metals and substances triggering classification for the Method 2 with extended M-factors

With respect to the waste streams in Data Set #1, the metal elements (worst case hypothesis) that triggered a hazardous classification were Zn (19 times for 32 samples), Cu (11), Hg (7), Pb (7), Co (5), Cd (4), Cr(VI) (4), and Ni (2). For organics, it was benz[a]anthracene (H400 M=100 and H410 M=1), and the pesticide chlorpyrifos (H400 M=10 000 and H410 M=10 000).

With respect to the waste streams in Data Set #2 (with the more limited analysis), the elements (worst case hypothesis) that triggered a hazardous classification were Zn (42 times for 88 samples), Cu (34), Pb (31), Cd (24), Hg (13), Ni (2), Cr(III) (1) and Cr(VI) (1), while concentrations of As (H400 M=10 and H410 M=10), Se (H400 M=1 and H410 M=10) and Sb (H411) compounds were too low to be significant. For organics, it was heptane, octane, cyclohexane, dipentene, 1,2,4-trimethylbenzene, 1,1-dichloro-1-fluoroethane, 1,2,4-trichlorobenzene and diesel fuel (gasoil), that contributed to the hazardous classifications.

Additional tables of M-factors (Tables 7.1 to 7.4)

In Table 3.1 of Annex VI of the CLP, “harmonised” M_{acute} -factors of 212 substances are supplied, mainly pesticides, nickel salts and compounds, cobalt sulphate, oxide and carbonate, benz[a]anthracene and dibenz[a]anthracene (PAHs) and other rare organic or metal compounds. There are 63 substances with $M_{acute} = 1$ (62 nickel substances and one pesticide), 67 substances with $M = 10$, 46 substances with $M = 100$, 29 substances with $M = 1000$, 6 substances with $M = 10\ 000$ and one substance with $M = 1\ 000\ 000$ (deltamethrin). Tables of M-factors are proposed for metal elements (“heavy metals”, worst case hypothesis) and organic substances, **covering the major cases in waste** (from Hennebert and Rebishung 2015, Andres 2013), in addition to the M-factors in Table 3.1 of Annex VI of CLP (Tables 7.1 to 7.4), eight “heavy metals” H400 elements have M_{acute} -factors and nine H410 elements have $M_{chronic}$ -factors (“worst case” hypothesis). They have been used in this study. About one hundred organic substances that have been encountered in waste have M-factors; this number includes the pesticides.

Tables 7.1 to 7.4

5. CONCLUSIONS

Analysis of two data sets has allowed the relative ranking of the five methods (frequency of classification from a set of compositions) to be assessed. The results correspond to what can be expected from an arithmetic approach, and depend on the presence of hazardous substances and the use of their M-factors:

- From Data Set #2 (88 H waste streams), not taking into account PAHs data but including heavy metals data, Method 3, 1 and 2 with extended M-factors give exactly the same assessment results for 55 of the waste streams (not all classified as H), and diverge for 33 waste streams data sets gathered from four waste types: packages and materials, organic pasty waste, hydrocarbons for incineration and halogenated solvents. Methods 2 and 4 classify less waste as hazardous. The ranking (decreasing number of calculated H waste) is Method 3 > Method 1 > Method 2 with extended M-factors > Method 2 > Method 4. This result corresponds to the arithmetic comparison of the five classification methods for HP 14 by calculation, using the hypothesis that the mean chronic M-factor = 10;
- From Data Set #1, with data including PAHs and heavy metals, the same ranking of the methods is obtained.

Additionally, the methods can be ranked by absolute concordance with the LoW with Data Set #1 and the air pollution control residue of Data Set #2. From Data Set #1, Method 2 with extensive M-factors:

- matches best with the LoW (80% concordant H and non-H by LoW, and 13% discordant for H waste by LoW in Data Set #1);
- correctly classifies waste containing cadmium, mercury ($M_{\text{chronic}} = 100$), polycyclic aromatic hydrocarbons – PAHs (frequently $M_{\text{acute}} = 100$, $M_{\text{chronic}} = 10$), pesticides (frequently M_{acute} and $M_{\text{chronic}} = 1000$ or 100) and in general the substances with high ecotoxicity.

Methods 1 and 3 are similar in terms of matching (76% and 72% concordant H and non-H by LoW, and 13% and 6% respectively discordant for H waste by LoW), but they will not correctly classify waste containing substances with high ecotoxicity (in particular the PAHs frequently encountered in waste). Method 2 which is limited to the M-factors published in the CLP, has insufficient concordance (64% concordant H and non-H by LoW, and 50% discordant for H waste by LoW). As the same method with extended M-factors gives the best performance, the lower performance is due to the limited set of M-factors. Method 4 is divergent (60% concordant

H and non-H by LoW, and 56% discordant for H waste by LoW).

From Data Set #2, Methods 2 and 4 don't correctly classify the 24 air pollution control residues and should not be used.

From the two sets of data, Method 2 with extended M-factors (corresponding more closely to the CLP methods used for products) matches best with the LoW when the code is known, and Method 3 and 1 will deviate from the LoW if the samples contain substances with high ecotoxicity (in particular PAHs). Methods 2 and 4 are not recommended.

6. ACKNOWLEDGEMENTS

This research is financially supported by the Ministère de l'Écologie et du Développement Durable, France.

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Assessment of four calculation methods proposed by the EC for waste hazardous property HP 14 ‘Ecotoxic’

Tables

Table 1: Classification methods for HP 14 by calculation proposed the DG ENV of the EU. For acute or chronic ecotoxicity, the concentrations of the substances with the relevant hazard statement code (HSC) are summed vertically according to each rule

Table 2: Arithmetic comparison of 5 classification methods for HP 14 by calculation, with hypothesis that mean chronic M-factor = 10 (concentration limits for H410 and H411)

Table 3: Comparison of 5 classification methods for HP 14 by calculation for hazardous elements and substances (heavy metals, PAHs, $M \geq 10$, extended M-factors)

Table 4: Classification of 32 waste streams by the European List of Waste (LoW) and by 5 calculation methods (H = Hazardous, NH = non-Hazardous, M = mirror entry of the LoW) (Data set #1)

Table 5: Table 5: Synthesis of classification of 32 waste streams by the European List of Waste (LoW) and by 5 calculation methods (Data set #1)

Table 6: Waste type, number of European List of Waste entries (all waste are estimated hazardous), number of samples, number of samples assessed hazardous by different calculation methods (ranked by decreasing number of samples calculated as hazardous) (Data set# 2)

Table 7.1: M-factors and concentration limit per substance and per elements (realistic worst case approach) for HP 14 acute and chronic. Elements (worst case) with hazard statement code H400 (other elements have no HSC H400)

Table 7.2: M-factors and concentration limit per substance and per elements (realistic worst case approach) for HP 14 acute and chronic. Elements (worst case) with hazard statement code H410 (other elements have no HSC H410)

Table 7.3: Some EC50 and Macute-factors of organic substances

Table 7.4: EC50 and Macute-factor, NOEC and Mchronic-factor of organic substances

Table 1: Classification methods for HP 14 by calculation proposed the DG ENV of the EU. For acute or chronic ecotoxicity, the concentrations of the substances with the relevant hazard statement code (HSC) are summed vertically according to each rule.

| Method | Σ HSC | Acute (rule 1) | Chronic | | | |
|--------|------------------------|--------------------------|--|----------|----------|----------|
| | | | (rule 1) | (rule 2) | (rule 3) | (rule 4) |
| 3 | H400 Aquatic acute 1 | - | | | | |
| | H410 Aquatic chronic 1 | | 0.10% | | | |
| | H411 Aquatic chronic 2 | | | 2.50% | | |
| | H412 Aquatic chronic 3 | | | | 25% | |
| | H413 Aquatic chronic 4 | | | | | 25% |
| 1 | H400 | 25% | | | | |
| | H410 | | 0.25% | 25% | | |
| | H411 | | 2.50% | 25% | | |
| | H412 | | 25% | 25% | | |
| | H413 | | | 25% | | |
| 2 | H400 | $25/M_{\text{acute}} \%$ | | | | |
| | H410 | | $2.5/M_{\text{chronic}} \%$ | | | |
| | H411 | | 25% | | | |
| | H412 | | | | | |
| | H413 | | | | | |
| 4 | H400 | - | | | | |
| | H410 | | $2.5/M_{\text{CLP}_{\text{chronic}}} \%$ | | | |
| | H411 | | | 25% | | |
| | H412 | | | | | |
| | H413 | | | | | |

Table 2: Arithmetic comparison of 5 classification methods for HP 14 by calculation, with hypothesis that mean chronic M-factor = 10 (concentration limits for H410 and H411 substances)

| Method 3 | Method 1 | Method 2 with ext. M-factors ($M_{\text{chronic}}=10$) | Method 2 with CLP M-factors ($M_{\text{chronic}}=10$) | Method 4 ($M_{\text{chronic}}=10$) |
|----------|--------------|--|---|---|
| 0.1% | 0.25% + 2.5% | $2.5/M\% + 25\%$ | $2.5/M\% + 25\%$ | $2.5/M\%$ or 25% |

Table 3: Comparison of 5 classification methods for HP 14 by calculation for hazardous elements and substances (heavy metals, PAHs, $M \geq 10$, extended M-factors)

| Elements/substances | M _{acute} -factor (not in CLP Annex VI) | M _{chronic} -factor (not in CLP Annex VI) | Concentration limits (lowest sum of substances with H400 or sum of substances with H410 hazard statement code) | | | | |
|--|--|--|--|----------|----------|----------|----------|
| | | | Method 2 with extended M-factors | Method 3 | Method 1 | Method 2 | Method 4 |
| Hg (worst case) | 1000 | 100 | 0.025% | 0.1% | 0.25% | 2.5% | 2.5% |
| Cd (worst case) | 100 | 100 | 0.025% | | | | |
| As, Co, Cr(VI), Cu, Pb, Zn (worst case) | 10 | 10 | 0.25% | | | | |
| Benzo[k]fluoranthene, anthracene, fluoranthene | 100 | 10 | 0.25% | | | | |
| Pyrene | 10 | 10 | 0.25% | | | | |
| Benz[a]anthracene | 100 | 1 | 0.25% | | | | |

Table 4: Classification of 32 waste streams by the European List of Waste (LoW) and by 5 calculation methods (H = Hazardous, NH = non-Hazardous, M = mirror entry of the LoW) (Data set #1)

| N | Waste | LoW | LoW | M3 | M1 | M2 +ext. M | M2 | M4 |
|----|--|-----------------------|-----|----|----|------------|----|----|
| 13 | Municipal Solid Waste Incinerator (MSWI) fly ash | 19 01 05* | H | H | H | H | H | H |
| 14 | Air Pollution Control (APC) residue industrial waste #1 | 19 01 07* | H | H | H | H | H | H |
| 16 | Industrial waste bottom ash | 19 01 11* | H | H | H | H | H | H |
| 19 | Packages and materials #2 | 19 12 11* | H | H | H | H | H | H |
| 28 | Hydrocarbon #1 | 13 07 03* | H | H | H | H | H | H |
| 58 | Sulfidic acid mine residue Pb Zn Cd | 01 03 04* | H | H | H | H | H | H |
| 67 | MSWI APC 3 | 19 01 07* | H | H | H | H | H | H |
| 59 | APC residue from animal meal incineration | 19 01 07* | H | H | H | H | H | NH |
| 10 | Wastes from transport tank cleaning, mixed sludge of food and chemical transport | 16 07 09* | H | H | H | H | NH | NH |
| 11 | MSWI Air pollution control (APC) residue, bicarbonate process | 19 01 07* | H | H | H | H | NH | NH |
| 12 | MSWI APC residue, lime process | 19 01 07* | H | H | H | H | NH | NH |
| 43 | APC residue from municipal waste after solid fuel, metals and organic matter separation | 19 01 07* | H | H | H | H | NH | NH |
| 63 | Treated wood containing hazardous substances | 17 02 04* | H | H | H | H | NH | NH |
| 66 | Acid-generating tailings from processing of sulphide ore | 01 03 04* | H | H | H | H | NH | NH |
| 17 | Metallic dust from aluminum industry | 10 03 19 * | H | H | NH | NH | NH | NH |
| 64 | Waste from physical and chemical processing of metalliferous minerals Cu Zn | 01 03 07* | H | NH | NH | NH | NH | NH |
| - | | | | | | | | |
| 1 | Municipal waste - Organic fraction separately collected | 20 01 08 or 20 02 01 | NH | NH | NH | NH | NH | NH |
| 46 | Bauxite residue | 01 03 09 | NH | NH | NH | NH | NH | NH |
| 57 | Demolition concrete 2 | 17 01 01 | NH | NH | NH | NH | NH | NH |
| 4 | Compost from mixed municipal waste, fraction < 30 mm after crushing | 19 05 01 or 20 03 01 | NH | H | NH | NH | NH | NH |
| 8 | Sludges from treatment of urban waste water | 19 08 05 | NH | H | NH | NH | NH | NH |
| 5 | Non-composted organic fraction of municipal wastes < 30 mm after crushing, | 19 05 01 | NH | H | H | NH | NH | NH |
| 3 | Mixed municipal waste, fraction > 30 mm after crushing | 19 05 01 or 20 03 01 | NH | H | H | H | NH | NH |
| 68 | Ferrous metal dust and particles | 12 01 02 | NH | H | H | H | NH | NH |
| 65 | End-of-life tyres, crushed 4 mm | 16 01 03 | NH | H | H | H | H | H |
| - | | | | | | | | |
| 44 | Surface treatment - sludges and filter cakes | 11 01 09* or 11 01 10 | M | H | H | H | H | H |
| 45 | Bottom ash and slag from municipal waste after solid fuel, metals and organic matter separation - matured and pretreated | 19 01 11* or 19 01 12 | M | H | H | H | H | H |
| 61 | Boiler dust from animal meal incineration | 19 01 15* or 19 01 16 | M | H | H | H | H | NH |
| 60 | Bottom ash from animal meal incineration | 19 01 11* or 19 01 12 | M | H | NH | NH | NH | NH |
| 6 | Active landfill leachate containing hazardous substances or landfill leachate other than those mentioned in 19 07 02 | 19 07 02* or 19 07 03 | M | NH | NH | NH | NH | NH |
| 7 | Closed landfill leachate containing hazardous substances or landfill leachate other than those mentioned in 19 07 02 | 19 07 02* or 19 07 03 | M | NH | NH | NH | NH | NH |
| 9 | Sludges from landfill leachate, after evapo-concentration | 19 02 05* or 19 02 06 | M | NH | NH | NH | NH | NH |

Table 5: Synthesis of classification of 32 waste streams by the European List of Waste (LoW) and by 5 calculation methods (Data set #1)

| Calculation method | Hazardous (H) or Non-Hazardous (NH) or Mirror entry (M) LoW | H by calculation method | NH by calculation method | Matching classification (25 samples) | Calculated NH but H by LoW (16 samples) |
|---------------------------|---|-------------------------|--------------------------|--------------------------------------|---|
| 2 with extended M-factors | H | 14 | 2 | 20 wastes = 80% | 2 wastes = 13% |
| | NH | 3 | 6 | | |
| | M | 3 | 4 | | |
| 1 | H | 14 | 2 | 19 wastes = 76% | 2 wastes = 13% |
| | NH | 4 | 5 | | |
| | M | 3 | 4 | | |
| 3 | H | 15 | 1 | 18 wastes = 72% | 1 waste = 6% |
| | NH | 6 | 3 | | |
| | M | 4 | 3 | | |
| 2 with CLP M-factors | H | 8 | 8 | 16 wastes = 64% | 8 wastes = 50% |
| | NH | 1 | 8 | | |
| | M | 3 | 4 | | |
| 4 | H | 7 | 9 | 15 wastes = 60% | 9 wastes = 56% |
| | NH | 1 | 8 | | |
| | M | 2 | 5 | | |

Table 6: Waste streams, number of European List of Waste entries (all waste are estimated hazardous), number of samples, number of samples assessed hazardous by different calculation methods (ranked by decreasing number of samples calculated as hazardous) (Data set # 2)

| Waste | LoW codes concerned | Samples | Method 3 | Method 1 | Method 2 extended | Method 2 | Method 4 |
|--------------------------------------|---------------------|-----------|-----------|-----------|-------------------|-----------|-----------|
| Solid | | 43 | 40 | 34 | 33 | 4 | 2 |
| Industrial APC* residue, bicarbonate | 1 | 3 | 3 | 3 | 3 | | |
| Industrial APC residue, lime | 1 | 1 | 1 | 1 | 1 | | |
| Industrial APC, filter dust | 1 | 3 | 3 | 3 | 3 | 2 | 1 |
| MSWI APC residue, bicarbonate | 1 | 4 | 4 | 4 | 4 | | |
| MSWI APC residue, lime | 1 | 6 | 6 | 6 | 6 | 1 | 1 |
| MSWI APC, fly ash | 1 | 7 | 7 | 7 | 7 | | |
| Packages and materials | 2 | 6 | 6 | 3 | 3 | | |
| Pasty waste, organic | 36 | 13 | 10 | 7 | 6 | 1 | |
| Liquid | | 45 | 18 | 17 | 15 | 15 | 11 |
| Cooling fluid | 10 | 3 | | | | | |
| Hydrocarbons, incineration | 49 | 10 | 3 | 3 | 1 | 1 | 1 |
| Hydrocarbons, recovery | 49 | 6 | 1 | 1 | 1 | 1 | 1 |
| Liquid, biological treatment | 142 | 3 | | | | | |
| Liquid, evapo-concentration | 35 | 3 | | | | | |
| Liquid, evapo-incineration | 35 | 1 | | | | | |
| Liquid, incineration | 23 | 2 | 1 | 1 | 1 | 1 | |
| Liquid, physico-chemical treatment | 142 | 5 | 2 | 2 | 2 | 2 | 2 |
| Oil, engine | 2 | 5 | 5 | 5 | 5 | 5 | 2 |
| Oil, hydraulic, recovery | 10 | 3 | 3 | 3 | 3 | 3 | 3 |
| Solvents, halogenated | 26 | 4 | 3 | 2 | 2 | 2 | 2 |
| Total | | 88 | 58 | 51 | 48 | 19 | 13 |
| Ratio H samples/total samples | | | 66% | 58% | 55% | 22% | 15% |

*Air Pollution Control

Table 7.1: M-factors and concentration limit per substance and per elements (realistic worst case approach) for HP 14 acute and chronic. Elements (worst case) with hazard statement code H400 (other elements have no HSC H400)

| Element | Worst case substance, CAS# | Formula | M _{acute} -factor | HP 14 acute Concentration limit /substance (Method 2 ext. M-factors) | Worst case Concentration limit /element (using the mass fraction of the element in the substance) (Method 2 ext. M-factors) |
|---------|----------------------------------|--------------------|----------------------------|--|---|
| Hg | (1) | CLP | 1000 | 0.025% | 0.02% |
| Cd | (1) | CLP | 100 (2) | 0.25% | 0.15% |
| As | (1) | CLP | 10 | 2.50% | 1.33% |
| Co | Cobalt oxide 1307-96-6 | CoO | 10 | 2.50% | 1.97% |
| Cr(VI) | (1) | CLP | 10 | 2.50% | 0.91% |
| Cu | Copper chloride | CuCl ₂ | 10 (3) | 2.50% | 1.18% |
| Pb | (1) | CLP | 10 | 2.50% | 2.07% |
| Zn | Zinc chloride | ZnCl ₂ | 10 | 2.50% | 1.20% |
| Mn | Potassium permanganate 7722-64-7 | KMnO ₄ | 1 | 25.00% | 8.69% |
| Ni | Nickel chloride | NiCl ₂ | 1 | 25.00% | 8.81% |
| Se | (1) / hyp. Lead selenate | PbSeO ₄ | 1 | 25.00% | 5.64% |

hyp: hypothesis of substance

- (1) Generic hazard statement code of CLP. Conversion of element to substance based on all the substances with that element in the CLP
- (2) Based on EC50 = 0.0034 mg/l. Lower EC50 values (0.0009 mg/l, M= 1000) are also reported.
- (3) Based on EC50 = 0.011 mg/l. A lower value of EC50 can be found in a European Commission - European Voluntary Risk Assessment Report (EU-VRAR) report but it is proposed to use this value instead

Table 7.2: M-factors and concentration limit per substance and per elements (realistic worst case approach) for HP 14 acute and chronic. Elements (worst case) with hazard statement code H410 (other elements have no HSC H410)

| Element | Worst case substance | Formula | M _{chronic} -factor | HP 14 Concentration /substance (Method 2 ext. M-factors) | Min. limit (M-factors) | Worst case Concentration /element (Method 2 ext. M-factors) |
|---------|----------------------------------|--------------------|------------------------------|--|------------------------|---|
| Cd | (1) | CLP | 100 | 0.025% | | 0.01% |
| Hg | (1) | CLP | 100 | 0.025% | | 0.02% |
| As | (1) | CLP | 10 | 0.25% | | 0.13% |
| Co | Cobalt oxide 1307-96-6 | CoO | 10 | 0.25% | | 0.20% |
| Cr(VI) | (1) | CLP | 10 | 0.25% | | 0.09% |
| Cu | Copper chloride | CuCl ₂ | 10 | 0.25% | | 0.12% |
| Pb | (1) | CLP | 10 | 0.25% | | 0.21% |
| Se | (1) / hyp. Lead selenate | PbSeO ₄ | 10 | 0.25% | | 0.06% |
| Zn | Zinc chloride | ZnCl ₂ | 10 | 0.25% | | 0.12% |
| Ag | Silver nitrate 7761-88-8 | AgNO ₃ | 1 | 2.50% | | 1.59% |
| Mn | Potassium permanganate 7722-64-7 | KMnO ₄ | 1 | 2.50% | | 0.87% |
| Ni | Nickel chloride | NiCl ₂ | 1 (2) | 2.50% | | 0.88% |

hyp: hypothesis of substance

- (1) Generic hazard statement code of CLP. Conversion of element to substance based on all the substances with that element in the CLP
- (2) Based on NOEC = 0.011 mg/l. A lower value of NOEC can be found in a European Commission - European Voluntary Risk Assessment Report (EU-VRAR) report but it is proposed to use this value instead

Table 7.3: Some EC₅₀ and M_{acute}-factors of organic substances

| CAS# | Substance | EC ₅₀ min mg/l | Macute |
|-------------|--|---------------------------|--------|
| 191-24-2 | Benzo(g,h,i)perylene | 0.0005 | 1000 |
| 107-02-8 | Acrolein | 0.007 | 100 |
| 110-30-5 | N,N'-ethylenedi (stearamide) | 0.0023 | 100 |
| 118-74-1 | Hexachlorobenzene | 0.005 | 100 |
| 120-12-7 | Anthracene | 0.0017 | 100 |
| 207-08-9 | Benzo(k)fluoranthene | 0.0012 | 100 |
| 298-04-4 | Disulfoton | 0.0041 | 100 |
| 3194-55-6 | 1,2,5,6,9,10 Hexabromocyclododecane | 0.0027 | 100 |
| 50-32-8 | Benzo(a)pyrene | 0.005 | 100 |
| 608-73-1 | Hexachlorocyclohexane | 0.009 | 100 |
| 6742-54-7 | Undecylbenzene | 0.01 | 100 |
| 77-47-4 | Hexachlorocyclopentadiene | 0.0035 | 100 |
| 85535-85-9 | Alcanes, C14-17 chloro | 0.0061 | 100 |
| 106325-08-0 | Epoxyconazole | 0.0147 | 10 |
| 106-47-8 | 4-Chloroaniline | 0.0563 | 10 |
| 107-64-2 | Dimethyldioctadecylammonium chloride | 0.0563 | 10 |
| 1113-02-6 | Omethoate | 0.026 | 10 |
| 121158-58-5 | Dodecylphenol, mixed isomers (branched) | 0.018 | 10 |
| 123-31-9 | Hydroquinone | 0.052 | 10 |
| 129-00-0 | Pyrene | 0.027 | 10 |
| 140-66-9 | para-tert-octylphenol | 0.014 | 10 |
| 143390-89-0 | Kresoxim methyl | 0.0167 | 10 |
| 1643-20-5 | Dodecyldimethylamine oxide | 0.0195 | 10 |
| 210555-94-5 | 4-dodecylphenol, branched | 0.017 | 10 |
| 25376-45-8 | Diaminotoluene | 0.041 | 10 |
| 301-12-2 | Oxydemeton-methyl | 0.026 | 10 |
| 3926-62-3 | Sodium chloroacetate | 0.028 | 10 |
| 79-11-8 | Monochloroacetic acid | 0.027 | 10 |
| 84649-84-3 | C12-14, Alkyldimethylamines | 0.026 | 10 |
| 85-01-8 | Phenanthrene | 0.0195 | 10 |
| 85535-84-8 | Alkanes, C10-13, chloro | 0.015 | 10 |
| 87-86-5 | Pentachlorophenol | 0.0122 | 10 |
| 88-85-7 | 2-sec-butyl-4,6-dinitrophenol | 0.039 | 10 |
| 95-31-8 | N-tert-butylbenzothiazole-2-sulphenamide | 0.091 | 10 |

Source: Portal of chemical substances, INERIS <http://www.ineris.fr/substances/fr/>

Table 7.4: EC₅₀ and M_{acute}-factor, NOEC and M_{chronic}-factor of organic substances

| CAS | Substance | Lowest EC ₅₀ [mg/L] | M _{acute} -factor | H400 | Lowest NOEC [mg/L] | Degradable. | M _{chronic} -factor | H410 | H411 | H412 |
|--------------|---|--------------------------------|----------------------------|------|--------------------|-------------|------------------------------|------|------|------|
| 2921-88-2 | Phosphorothioic acid, diethyl (-trichloropyridinyl) ester | 0.00001 | 10000 | H400 | 0.00006 | no | 1 000 | H410 | | |
| 34256-82-1 | Acetamide, 2-chloro-N-(ethoxymethyl)- N-(2-ethyl-6-methylphenyl)- | 0.00052 | 1000 | H400 | 0.00006 | no | 1 000 | H410 | | |
| 118-74-1 | Benzene, hexachloro- | 0.005 | 100 | H400 | 0.00013 | no | 100 | H410 | | |
| 609-046-00-1 | Trifluralin | 0.012 | 10 | H400 | 0.0003 | no | 100 | H410 | | |
| 207-08-9 | Benzo[k]fluoranthene | 0.0011 | 100 | H400 | 0.00027 | | 10 | H410 | | |
| 120-12-7 | Anthracene | 0.0012 | 100 | H400 | 0.0012 | no | 10 | H410 | | |
| 206-44-0 | Fluoranthene | 0.009 | 100 | H400 | 0.0012 | no | 10 | H410 | | |
| 129-00-0 | Pyrene | 0.02 | 10 | H400 | 0.0012 | no | 10 | H410 | | |
| 87-68-3 | hexachloro-13-butadiene | 0.06 | 10 | H400 | 0.004 | no | 10 | H410 | | |
| 608-93-5 | Benzene, pentachloro- | 0.1 | 10 | H400 | 0.01 | no | 10 | H410 | | |
| 85509-19-9 | Flusilazole | 1.2 | | | 0.003 | no | 10 | H410 | | |
| 56-55-3 | Benz[a]anthracene | 0.0018 | 100 | H400 | 0.0012 | | 1 | H410 | | |
| 85-01-8 | Phenanthrene | 0.02 | 10 | H400 | 0.01 | | 1 | H410 | | |
| 112-41-4 | 1-Dodecene | 22 | | | 0.004 | | 1 | H410 | | |
| 872-05-9 | Decene | 22 | | | 0.01 | | 1 | H410 | | |
| 112-18-5 | 1-Dodecanamine, N,N-dimethyl- | 0.014 | 10 | H400 | 0.02 | | | | H411 | |
| 793-24-8 | Benzenediamine,(-dimethylbutyl)-phenyl- | 0.03 | 10 | H400 | 0.02 | | | | H411 | |
| 81406-37-3 | Fluroxypyr 1-methylheptyl ester | 0.04 | 10 | H400 | 0.02 | | | | H411 | |
| 20020-02-4 | Naphthalene, 1,2,3,4-tetrachloro- | 0.07 | 10 | H400 | 0.1 | | | | H411 | |
| 1928-43-4 | Acetic acid, (2,4-dichlorophenoxy)-, 2-ethylhexyl ester | 0.23 | 1 | H400 | 0.02 | | | | H411 | |
| 101-21-3 | Chlorpropham | 0.43 | 1 | H400 | 0.02 | | | | H411 | |
| 87-61-6 | 123-trichlorobenzene | 0.33 | 1 | H400 | 0.03 | | | | H411 | |
| 86-73-7 | Fluorene | 0.41 | 1 | H400 | 0.03 | | | | H411 | |
| 83-32-9 | Acenaphthene | 0.12 | 1 | H400 | 0.04 | | | | H411 | |
| 103-23-1 | Hexanedioic acid, bis(2-ethylhexyl) ester | 0.23 | 1 | H400 | 0.04 | | | | H411 | |
| 115-86-6 | Triphenyl phosphate | 0.4 | 1 | H400 | 0.04 | | | | H411 | |
| 120-82-1 | 124-trichlorobenzene | 0.45 | 1 | H400 | 0.04 | | | | H411 | |
| 15299-99-7 | Napropamide | 0.68 | 1 | H400 | 0.05 | | | | H411 | |
| 103-24-2 | Nonanedioic acid, bis(2-ethylhexyl) ester | 0.07 | 1 | H400 | 0.06 | | | | H411 | |
| 95-94-3 | Benzene, 1,2,4,5-tetrachloro- | 0.32 | 1 | H400 | 0.06 | | | | H411 | |
| 128-37-0 | Butylated Hydroxytoluene | 0.17 | 1 | H400 | 0.07 | | | | H411 | |
| 56-23-5 | Carbon Tetrachloride | 0.25 | 1 | H400 | 0.07 | | | | H411 | |
| 85-68-7 | benzyl butyl phtalate | 0.49 | 1 | H400 | 0.08 | | | | H411 | |
| 84-74-2 | dibutyl phtalate | 0.35 | 1 | H400 | 0.1 | | | | H411 | |
| 100-44-7 | Benzyl chloride | 0.39 | 1 | H400 | 0.1 | | | | H411 | |

| CAS | Substance | Lowest EC ₅₀ [mg/L] | M _{acute} -factor | H400 | Lowest NOEC [mg/L] | Degradable. | M _{chronic} -factor | H410 | H411 | H412 |
|------------|---|--------------------------------|----------------------------|------|--------------------|-------------|------------------------------|------|------|------|
| 91-20-3 | Naphtalene | 0.8 | 1 | H400 | 0.12 | | | | | H412 |
| 92-52-4 | Biphenyl | 0.3 | 1 | H400 | 0.17 | | | | | H412 |
| 108-70-3 | Benzene, 1,3,5-trichloro- | 0.4 | 1 | H400 | 0.2 | | | | | H412 |
| 106-46-7 | 1,4-dichlorobenzene | 0.7 | 1 | H400 | 0.2 | | | | | H412 |
| 106-43-4 | 4-chlorotoluene | 0.96 | 1 | H400 | 0.32 | | | | | H412 |
| 119-47-1 | Phenol, methylenebis[(-dimethylethyl)-methyl- | 1 | 1 | H400 | 0.34 | | | | | H412 |
| 88-06-2 | Phenol, 2,4,6-trichloro- | 0.41 | 1 | H400 | 0.5 | | | | | H412 |
| 95-50-1 | 1,2-dichlorobenzene | 0.66 | 1 | H400 | 0.63 | | | | | H412 |
| 112-53-8 | 1-Dodecanol | 0.97 | 1 | H400 | 0.73 | | | | | H412 |
| 131-17-9 | 1,2-Benzenedicarboxylic acid, di-2-propenyl ester | 0.23 | 1 | H400 | 1.16 | | | | | |
| 36653-82-4 | 1-Hexadecanol | 0.4 | 1 | H400 | 100 | | | | | |

Source: Andres 2013.