

IDENTIFYING YOUR WASTE WITH THE EUROPEAN WASTE CATALOGUE (cont)

In the EWC, hazardous wastes are identified by an asterisk (*). The EWC splits hazardous wastes into those that will always be hazardous (*Fluorescent Tubes 20 01 21**) due to their components and those that may be classed as either hazardous or non-hazardous depending on the level of hazardous properties. For the list of hazardous property concentrations (H1-H14) see the EA technical guidance note WM2. For example, water based paint is likely to fall under a non-hazardous coding whilst those that contain heavy metal are likely to contain properties that are flammable or toxic and will be coded as hazardous. Companies may therefore need to seek advice and assistance on the identification of certain potential hazardous wastes to comply with the following:

- Complying with Duty of Care Regulations in the identification of waste by EWC Code;
- Disposal to landfill, must be to a hazardous landfill site only;
- Complying with Hazardous Waste Regulation (company may need to notify the Environment Agency if they dispose of more than 50kg of hazardous waste per annum or more than 2 consignment notes per annum);
- Not mixing hazardous waste and the pre-treatment of hazardous waste.

If you believe you may produce any of the new hazardous wastes you should seek further information from your waste contractor.

A FEW TIPS ON HOW TO MINIMISE YOUR HAZARDOUS WASTE

- Identify the true cost of hazardous waste disposal including labour and wasted resources.
- Awareness - conduct a waste audit in your company to identify (hazardous) waste and code your waste with the EWC.
- Avoid using fluorescent tubes, instead install sky-lights or low wattage bay lighting (save energy/money too).
- Send solvents for recovery - most solvent mixtures can be filtered and re-used. Cover up solvent baths to avoid evaporation.
- Use top of the range oils with longer stand times (check with your supplier).
- Check quality of your oils (lab tests - check with your supplier) to increase its' lifespan.
- Clean and drain used packaging (paint/ink tins, oil drums etc) so they don't have to be classed and treated as hazardous (rags resulting from this are still hazardous of course)

OTHER RELEVANT REGULATIONS

- Duty of Care Regulations (EPA 1990 Section 34) (Issue 2/Series 1)
- Landfill Regulations (England & Wales) 2002 (Issue 1/Series 1)
- Waste Acceptance Criteria (WACs) (Due 2005)

SOURCES OF INFORMATION

DEFRA Central Government

www.defra.gov.uk

Environment Agency Wales

www.environment-agency.gov.uk

NetRegs legislation explained

www.environment-agency.gov.uk/netregs

Waste Resources Action Plan

www.wrap.org.uk

Arena Network Business Support

www.arenanetwork.wales.org.uk

Letsrecycle

www.letsrecycle.com

N.B. BRASS is not responsible for the content of external internet sites

For further information see Chemicals (Hazard Information & Packaging for Supply) Regulations 2002 (CHIP3) & EA technical guidance WM2.

These notes will provide a series of guidance on current waste issues from regulation (series 1), specific industry sector waste problems (series 2) and finally specific individual problem waste streams (series 3).

Each week a different piece of legislation, industry sector or waste type will be discussed. All briefing notes can be downloaded from the website below.

N.B.: These notes are merely a guidance and should not be considered as advice from any of the parties contained within this leaflet.

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Will your company be classed as a producer of hazardous waste under new hazardous waste legislation?

Do you know how to identify hazardous waste?

How will the new Hazardous Waste list affect your business?

Do you know how the new Landfill Regulations affect your business?



These are just a few of the many issues raised by companies during the National Waste Survey 2003. This series of briefing notes aims to highlight the issues of waste management and how new regulations could impact on your company and what you have to do to comply, including some simple alterations in business practice. This series has been devised for you the producer to highlight the problems and provide some simple tips on how to help you manage waste.

Series 1/Issue 3

HAZARDOUS WASTE AND YOUR BUSINESS - WILL NEW LEGISLATION EFFECT YOUR BUSINESS?

New legislation dealing with the consignment of hazardous waste will increase the number of wastes classified as hazardous. Some wastes, which were once considered not to be special under the Special Waste Regulations, have now been reclassified as hazardous and as such many more businesses will be considered to be hazardous waste producers. As a business more responsibility falls upon you to comply with the safe disposal, recovery, collection or transportation of these hazardous wastes. This leaflet is intended to assist you in answering the following. Please note the disposal of hazardous waste is covered by the Landfill Regulations (Eng. & Wales) 2002 discussed in Issue 1 of Series 1.

DO YOU KNOW:

- What the new hazardous wastes will be?
- If you dispose of any of these hazardous wastes?
- How you can dispose of these wastes?
- If the new Hazardous Waste Regulations will apply to you and what to do to comply?
- Who takes your waste away and whether they are properly registered/licensed?
- Where your contractors take your waste?
- How much cost/income you generate from disposal of your waste?

FLOURESCENT TUBES — 20 01 21*



HAZARDOUS WASTE AND YOUR BUSINESS

The new Hazardous Waste Regulations (HWR), likely to come into force in the summer of 2005, are designed to improve the monitoring and tracking of the movement of hazardous waste. The UK Government and the three devolved administrations will all produce their own system but the system in England and Wales will be very similar.

HOW DO THE NEW REGULATIONS EFFECT YOU AND YOUR BUSINESS

Main changes in the new regulations are:

- The term *Special Waste* will be replaced with the term **Hazardous Waste** as defined by the *Hazardous Waste Directive* and the *European Waste Catalogue (EWC)* see *List of Wastes Regulations 2004*
- **Pre-notification of hazardous waste producing premises** to the Environment Agency if site produces over 50kg of hazardous waste per annum and/or more than 2 consignment notes per annum. If your company falls below this threshold, although there is exemption to notification of site, all other aspects of the hazardous waste regulations will apply if you produce hazardous waste.
- **Abolition of 3-day pre-notification** of the movement of hazardous waste to Environment Agency.
- Introduction of **quarterly reporting** to the Environment Agency of all individual hazardous waste consignments (on the basis of consignment notes issued for every individual load). Producers are also required to keep records of all consignment notes (see also *Duty of Care—series 1/issue 2*)
- **Consignees to send returns to producers** notifying them of the receipt of waste
- **General prohibition on mixing of hazardous wastes** without a permit—mixing includes with another hazardous waste, a non-hazardous waste or any other substance or material— unless mixing is allowed under a permit.
- Introduction of the use of the **European Waste Catalogue** which incorporates the *Hazardous Waste List*.
- **Ban on diluting of hazardous waste** (to render the waste to a level below threshold values, with intent to effectively 'making' it non-hazardous).
- Waste is properly **packaged and labelled** in accordance with international and EU standards in force.

WHAT EFFECT WILL CHANGES TO THE REGULATIONS HAVE ON YOUR BUSINESS:

- Increased cost of disposal and pre-treatment
- Administrative management (record keeping)
- Increased awareness about the waste you and your business produce; is it hazardous or not?
- Know your contractors – is the waste you want to dispose of covered by their licence.
- The need to budget for rising cost of treatment and disposal.

IDENTIFYING YOUR WASTE WITH THE EUROPEAN WASTE CATALOGUE (EWC)

Every business will need to identify their hazardous waste with the help of the EWC in order to complete the consignment notes correctly. Implementation of the EWC (and Revised Hazardous Waste List) will bring new additions into the HWR - the newly hazardous wastes. A few examples:

- **Cathode Ray Tubes (CRT): Televisions and computer monitors (EWC 16 02 13*)**
- **Fluorescent tubes (EWC 20 01 21*)**
- **Certain types of batteries (EWC 16 06 ..*/20 01 33*)**
- **All oils (except edible)**

YOU WILL BE REQUIRED TO USE THE EWC CODES ON YOUR CONSIGNMENT NOTES.

The EWC will assist in identifying hazardous wastes and in completing consignment notes with the six digit code provided for each waste type. Split into 20 chapters. Chapters 1-12 and 17-20 describe wastes from business types and general process types, chapters 13-15 describe particular generic groups of waste and chapter 16 describes wastes not otherwise specified. Codes ending with 99 are normally not used unless no other code can be found (non descriptive)

Step I: Identify the source/process and go to 1-12 or 17-20 first. If no code can be found then:

Step II: Identify the generic waste group and go to 13-15 then. If no code can be found then:

Step III: Identify the specific waste and go to 16 if no code can be found and only then use the 99 codes of the appropriate chapter