

Memo

To Safety Co-ordinators (for onward transmission to school safety advisors)

From Dr Melanie Taylor, University Safety Advisor

Date 12th July 2005

Distribution Dr S A Robson, P Lord, D Oatway

Reference Circular 12/2005

Hazardous Waste (England & Wales) Regulations 2005.

These Regulations come into effect on 16th July 2005, and implement EU requirements for the control and tracking of hazardous waste. They repeal the Special Waste Regulations 1996, and replace the term "special waste" with "hazardous waste".

The University will need to consider in detail how to comply with the Regulations, but faculties, schools and administrative directorates should be aware of some key features.

- the definition of hazardous waste is very wide indeed, and includes wastes previously referred to as special waste, but now also includes waste electronic and electrical equipment (PCs, kettles, light tubes, batteries, etc). The reference list (referred to as the European Waste Catalogue, or EWC, appears on the Environment Agency website at http://www.environment-agency.gov.uk/commondata/acrobat/2_haz_waste_app_a.pdf
- we are required to register all premises producing more than 200kg hazardous waste per annum. This amounts to a few TVs or PCs, and generally speaking, only the smallest building is likely to be exempt from registration.
- Estates are taking steps to register our buildings (contact Phil Lord for premises producing clinical waste, Damian Oatway for other premises). Some companies are advertising their services to register premises at a fee in excess of that charged by the Environment Agency - **there is no need for anyone other than Messrs Lord or Oatway to take any action with respect to registration.**
- Waste collection contractors will not remove waste from University premises unless they have details of the registration.
- Waste falling into separate categories in the European Waste Catalogue must be segregated into different bins or collection containers. Thus, it will be necessary to provide separate collection facilities for different waste streams. Colour coded containers will be available via the collection contractors – contact Phil Lord. Faculties and schools will need to make urgent arrangements to segregate their waste streams and to weigh the containers of waste they produce.

- Schools etc will also need to advise their staff and students about local collection arrangements, and to promote greater awareness about the need to segregate types of waste.
- It will be an offence to mix hazardous wastes of different classifications, or to mix hazardous waste with non-hazardous waste, unless it is technically not feasible to separate them. For example, previously, if non-clinical waste was deposited in a clinical waste bin, the school simply paid a higher price for disposal of unnecessary clinical waste. Now, in addition to paying the premium charge, it will be a criminal offence.
- The EWC is long, and many schools will potentially generate wastes falling into numerous categories. It remains to be seen how practicable separation of these will be. It is suggested that those dealing with waste prepare a list of the EWC codes they are more likely to use, for ease of reference.
- An example of the complexity of the EWC is code 16 06 – batteries. There are separate categories for lead batteries, Ni-Cd batteries, mercury-containing batteries, alkaline batteries, other batteries, and separately collected electrolyte. Waste solvents can still be collected as “other halogenated solvents and solvent mixtures” and “other solvents and solvent mixtures” under codes 14 06 02 and 14 06 03 respectively, (although chlorofluorocarbons, HFCs and HCFCs must be separated out).
- Detailed records need to be kept by the waste producer (ie school or centre) about the type(s) of waste, weight of each container, consignment dates, etc, and regular returns have to be made to the Environment Agency. An internal form to be used for this purpose is attached. Note that if this is not completed, waste cannot be collected by contractors.

The Regulations are fairly complex, and will require a planned and considered response throughout the University.

Enquiries about the management of hazardous waste streams should be directed to

Clinical waste – Phil Lord, x52252, philip.lord@manchester.ac.uk

Other wastes - Damian Oatway, x52277, damian.oatway@manchester.ac.uk

Enquiries about health and safety issues to do with hazardous waste should be dealt with through the school safety advisors and University Safety Co-ordinators, as usual. If there are any specific enquiries about transportation of hazardous waste (which will normally be dealt with by the collection contractor), Kath Shipley may be able to assist (x55712, kathleen.shipley@manchester.ac.uk)

Dr Melanie Taylor
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Internal Hazardous Waste Transfer Note

Building Name:

Registration Code:

Date:

Consignment Code:

Waste Details

Waste Description:

EWC Code:

Quantity (kg):

Chemical and Biological Components:

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Hazard Code:

Container and Packaging Group:

Collected From

Name:

Signature:

Carrier of Waste

Name:

Signature:

Receiver of Waste

Name:

Signature:

Location: