

MINIMISING HAZARDOUS WASTE AT WORK



PROTECTING the quality of our water, soil, and air by preventing the release of toxic compounds is the main focus of hazardous waste prevention programmes. In addition to promoting proper storage and disposal of toxic waste, many programmes are emphasising pollution prevention.

REDUCING waste at the source (known as 'source reduction') is the most efficient method of minimising waste. This method means consuming less and using existing resources more efficiently. Because source reduction prevents materials from entering the waste stream in the first place, it reduces the need to reuse and recycle discarded materials.

What types of waste are hazardous?

Wastes are classed as hazardous according to the definition in Section 4(2) and associated Schedules of the Waste Management Acts 1996-2007 (Article 1(4) of Council Directive 91/689/EEC). Wastes are classified according to the European Waste Catalogue (EWC) and Hazardous Waste List, which is available from the EPA and can either be purchased from them or viewed on www.epa.ie. Hazardous wastes are identified with an asterisk * placed after the EWC number, for example:

- EWC 15 01 10* packaging containing residues of or contaminated by dangerous substances
- EWC 17 05 03* soil and stones containing dangerous substances
- EWC 20 01 19* pesticides
- EWC 20 01 29* detergents containing dangerous substances

Common hazardous wastes arise from:

- **PAINTS, THINNERS, WOOD PRESERVATIVES, AEROSOL CANS, ADHESIVES**
- **FLUORESCENT LIGHT TUBES, BATTERIES, USED INK/TONER CARTRIDGES**
- **OIL WASTES** (excluding edible oils), **USED OIL FILTERS/OIL RAGS**
- **WASTE ELECTRICAL AND ELECTRONIC EQUIPMENT (WEEE)**
e.g. **TV'S, COMPUTER MONITORS, FRIDGES**
- **LABORATORY AND PROCESS CHEMICALS WITH HAZARD WARNING LABELS**

The **Environmental Protection Agency (EPA)** has responsibility for establishing and reviewing the National Hazardous Waste Management Plan which can be viewed on their website www.epa.ie. The EPA's Paper Tool for Identification of the Hazardous Components of Waste is also available on their website.

Legislation

Legislation puts the onus on businesses to minimise waste and to ensure that any waste generated is segregated, securely contained and labelled, with final recovery or disposal at an approved facility. Waste contractors that take waste off-site must be approved under the Waste Management (Collection Permit) Regulations S.I. No. 402 of 2001.

Regulations which address specific waste streams include:

- *WEEE Regulations - Waste Electrical & Electronic Equipment S.I. No. 340 of 2005*
(These Regs include WEEE Take-back Scheme)
- *ELV Regulations - End of Life Vehicles S.I. No. 282 of 2006*
- *European Communities (Waste Oils) Regulations - S.I. No. 399 of 1992*

Certain other regulations refer to hazardous waste in general, such as:

- *Waste Management (Hazardous Waste) Regulations S.I. No 163 of 1998 / S.I. No. 73 of 2000*
- *Waste Management (Movement of Hazardous Waste) Regulations S.I. No. 147 of 1998*
- *Waste Management (Shipments of Waste) Regulations 2007 S.I. No. 419 of 2007*

Reducing waste at source

General

- Top management need to display their full commitment.
- Actively involve employees and provide feedback on the improvements made.



Measure

Monitor

Manage

STEP 1: Conduct a Waste Audit

- Establish the different sources, types and amounts of waste.
- Measure the cost of waste - not just for disposal but other related costs such as labour, materials, energy and water.

STEP 2: Establish Targets and Implement Programme

- Waste reduction can often be made through simple, low-cost measures.
- Assess how hazardous waste can be eliminated or reduced through material substitution e.g. replacement of solvent-based paints with water-based paints.
- Redesign of process or product can save time and money as well as avoiding waste generation.
- Look at ancillary services to see how wastes, e.g. cleaning agents could be minimised. Use rechargeable rather than disposable batteries. Avoid the use of aerosols.
- Recovery such as reuse of solvent can lead to lower purchase and disposal costs.
- Safe off-site recovery or disposal is essential for any waste generated.

STEP 3: Review Progress

- Assess how targets have been met.
- Set further targets and thus feed back into the cycle of continuous improvement.

IMPORTANT NOTE:

This leaflet is not intended to be a definitive guide. Businesses need to have knowledge of and consult directly with all relevant legislation and publications for a full and legal interpretation of requirements. All legislation and standards for handling of hazardous materials must be followed.

Take your hazardous waste seriously - You can't afford not to!

Handling and Storage

- The waste must be segregated and adequately contained and labelled in accordance with international and EU standards.
- Records must be kept, such as quantity, nature and origin of waste produced, as well as details on removal off-site and final treatment or disposal.
- The Regulations also set out additional provisions for substances such as polychlorinated biphenyls (PCB's), asbestos, batteries and waste oils.
- Large scale hazardous waste storage may require authorisation from the local authority or a waste licence from EPA. Similarly, recovery activities would require an EPA waste licence if the company is not already EPA licensed.

Removal of Hazardous Waste Off-Site

- Select a haulier who has a Waste Collection Permit which covers your local authority area and includes the relevant EWC codes. Drivers must be HAZCHEM/ADR certified.
- Find out in advance the destination of the waste and ensure the site is licensed.
- You need to obtain a Consignment Note (C1 Form) from your local authority and complete Part A of the form before the waste goes off-site. (See details).
- You must secure documentary evidence that the waste has reached its final destination, and keep records of this evidence for a minimum of five years.

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Completion of a C1 Form for removal of hazardous waste

You need to obtain a Consignment Note (C1 Form) from your local authority in advance of hazardous waste leaving your premises. Part A of the form is to be completed by you the producer / consignor. Part B must be completed by the carrier after loading the waste and Part C must be completed at the site of destination. The five copies are distributed as follows:

- White copy to the Haulier
- Green copy to the Local Authority of Destination
- Blue copy to the Local Authority of Dispatch
- Yellow Copy to the Facility of Destination
- Pink Copy to be retained by Consignor

Use of a C1 Form does not apply to the movement of hazardous wastes for direct export, waste oil and end-of-life vehicles. In those cases, all other relevant legislation must be followed. Direct export must comply with regulations on the transfrontier shipment of waste (TFS) - S.I. No. 419 of 2007. Dublin City Council is designated the National Competent Authority for such shipments.



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