WASTE PRE-TREATMENT: WILL YOU COMPLY?

The new requirements of the Landfill Regulations 2002 for England and Wales came into force on 30th October this year. Two new requirements, previously only applicable to hazardous waste, now apply to all business non hazardous waste destined for landfill. Non-hazardous landfills will only be able to accept non-hazardous waste that has been treated and they will no longer be able to accept liquid wastes. The new requirements now force producers of waste destined for landfill to ensure that they know who takes responsibility for its pre-treatment.

For some waste producers, compliance with the Landfill Regulations will be simple e.g. they could collect individual waste streams separately and recycle one or more of them, however, logistical problems such as lack of space for sorting and storing may arise.

To comply with the new requirements, waste collectors must demonstrate to landfill operators that the waste has been treated. This means that they must either take non-treated waste to a facility for treatment or ensure that it is treated prior to collection.

Where producers say that the waste has already been treated, then it is likely that waste collectors will require a written declaration or inclusion as part of the Duty of Care transfer note from the waste producer.

Landfill operators must now ensure that waste arriving at the landfill has undergone treatment and they will inspect paperwork and waste on arrival at the site. If it is evident that waste has not been pre-treated, then as part of the landfill site’s waste acceptance procedures, the landfill operator will need to manage the waste in the same way as they would for any other non-permitted waste, i.e. notification of a firm’s non-compliance to the Environment Agency (EA), removal of the waste off-site or returning the waste to the producer, the producer being charged additional fees by the waste contractor.

In recent years, waste management companies have undertaken significant investment in various types of biological treatment facilities e.g. such as composting and anaerobic digestion plants or, thermal treatment facilities such as energy from waste plants. There is wide recognition throughout the waste industry that the landfill tax is not high enough to encourage sufficient investment in speculative industrial and commercial waste treatment facilities. On price comparison grounds the landfill option continues to be attractive, however, the proposed rises in landfill tax from April 2008 may well stimulate investment going forward.

SLR Consulting, a leading advisor on waste management, has not seen a significant increase in applications being made by waste operators seeking permissions to operate pre-treatment facilities, it would seem that waste companies are confident that their existing facilities have sufficient capacity to treat waste prior to being consigned to landfill.

The ban on disposal of non-hazardous liquid wastes to landfill came into force from October
affecting liquid wastes from a variety of industries will require pre-treatment prior to disposal. Are the new landfill requirements likely to lead to an increase in disposal costs? The Environment Agency thinks not – it anticipates that a review of waste production and management options can often identify potential for cost savings. It would appear, however, that these assumptions rely on the fact that businesses have the time, knowledge and resources to explore fully their options for disposal of their waste prior to going to landfill.

The above is an extract from an article by Clare Boles, principal at SLR Consulting Ltd who have given permission for publication of this extract. Information on the pre-treatment of wastes, and the service provided by SLR Consulting is available - tel: 029 204 97366 or email: cboles@slrconsulting.co.uk, SLR web site: www.slrconsulting.co.uk

Health, Safety and Environment

Health and Safety Commission (HSC) launches consultation on a new chemical classification and labelling regulation

The HSC has launched a 12-week consultation on the proposed European Regulation on the classification, labelling and packaging of chemicals, based on the United Nation’s Globally Harmonised System (GHS) The Regulation, which is currently being negotiated by European Union Member States, will eventually replace the existing classification and labelling system that many chemical suppliers will know through the Chemicals (Hazard Information and Packaging for Supply) Regulations – known as CHIP.

The consultation invites stakeholders to review the proposed Regulation and respond to the HSC with any comments. The EC formally launched the proposed Regulation on 27th June 2007. The Regulation is a major step forward in achieving a global system for identifying the hazards in chemicals and advising users of those hazards through labels. Although many of the duties to classify, label and package hazardous chemicals correctly will remain the same, the Regulation will also introduce:

- Some new scientific criteria to classify hazards;
- Some new hazard pictograms or symbols;
- New hazard and precautionary statements for the labels which will alert users to the dangers present.

New Guidance on the use of Trichloroethylene (TCE)

New guidance has been issued on the use of TCE under the Solvent Emissions Directive (SED) to protect the environment with requirements applicable from end of October 2007. TCE with a risk phrase R45 is classed as a higher risk solvent and if SED applies, the user has to substitute TCE in the shortest possible time (Defra Guidance note AQ9(04)

TCE is a ‘Priority Substance’ under the EU’s Existing Substances Regulation (EC/793/93). Following a voluntary agreement for the safe use of TCE in metal cleaning, signed by all European producers:

- TCE will not be supplied after 2010 unless the user has a ‘closed system’.
- Users must give a written undertaking that TCE will only and exclusively be used in a ‘closed system’.

The full guidance can be viewed on IMF and SEA websites: www.uk-finishing.org.uk & www.sea.org.uk
Nickel Salts Guidance for Electroplaters

At the nickel & nickel salts guidance symposium held recently at the Birmingham Medical Institute two leaflets were launched to nearly 100 delegates in attendance:

• Controlling the risk of inhaling mist containing nickel and
• Controlling the risk of skin exposure

Both documents are free to download from HSE’s webpages at http: www.hse.gov.uk/surfaceengineering/information.htm

New classification for the affected nickel salts and their risk phrase under the 30th and 31st ‘Adaptations to Technical Progress (ATPS) to include the Risk Phrase R49: may cause cancer by inhalation are as follows: Nickel Carbonate, Nickel Sulphate, Nickel Chloride, Nickel Nitrate & Nickel Sulphamate

Carc. Cat 1; R49. Repr. Cat 2; R61. Muta. Cat 3; R68 The reclassification is significant because it affects the way substances are treated under COSHH, specifically under Regulation 7(5).

Contaminated land guidance needed

The Environment Industries Commission (EIC) is urging the government to speed up new guidance on assessing contaminated land. EIC chiefs say national guidance would help to remove some of the barriers, which could help developers from using previously developed sites. Director of EIC, Merlin Hyman said ‘No one is going to go ahead and build on anything that had any development on it beforehand without assessing the risk, even if it was a very low-risk development’.

HSC says don’t overcomplicate health and Safety

As a part of the Government’s Better Regulation Agenda the Health and Safety Commission (HSC) and the Health and Safety Executive (HSE) have initiated a dedicated project to help small and medium size businesses (SMEs) to fulfil their health and safety requirements as outlined by law. With this initiative HSE aims to reduce the cost of risk assessment to most business by a third. What has come to be known as ‘elfandsafety’ can be a frustrating business. In part it’s frustrating because so many stories you hear are based on misinterpretations of the law, or the misguided actions of a few individuals. H & S safety law is flexible, but it can be intimidating if you are not sure what is required.

Building on a sensible risk campaign, HSC announced the launch of three more of HSE’s example risk assessments to help businesses, saying you don’t need to overcomplicate things, keep your risk assessment fit for purpose, make it a living document and act on it. Risk assessment should be about what practical steps you need to take to protect people, not paperwork for its own sake - filling in a form never saved a life. HSE has been working closely with stakeholders to develop industry-specific concise and practical example of risk assessments that will help businesses with the information they need to make informed decisions, and make significant impact on the amount of time and money they feel they need to spend managing the risks in their workplaces. This project will help SMEs understand what a ‘good enough’ risk assessment looks like.

In Court today

A waste company has been fined £30,000 plus £13,000 costs, for trying to illegally ship maggot infested waste abroad in containers labelled ‘paper waste’ which held cardboard, tins, plastics, glass textiles, council collected rubbish and maggots.
A company has been fined £15,000 for a serious breach of its pollution prevention and control permit at its Asbestos handing site. One of the permit conditions was that asbestos material was to be properly covered. An inspector revealed that clouds of dust containing asbestos was allowed to enter the atmosphere.

**Company News and Products**

**E C Williams Ltd**
E C Williams are the UK distributor for X-Loupe™, a revolution in portable microscope technology, which is set to replace the role of the traditional laboratory microscope in the finishing and protective coatings industry. It is ideal for quality control and inspection of blemishes on surface coatings, where it can save time, expense and help safeguard against potential errors and misconceptions.
Further information from ECW, Tel: 0121 236 2524 or email: plating@ecwilliams.co.uk

**Schloetter Company Ltd**
Two new products:
SLOTOCLEAN BZ 80 – an inhibited mixed acid pickle/de-greaser with extender bath life
SLOTOTIN MB 110 – a new process with the ability to withstand heat ageing, resisting yellowing and poor solderability. Suitable for high speed plating and the same composition for both barrel and rack applications.
Details – Paul Griffiths Tel: 01386 552331 or email: sales@schloetter.co.uk

**Donaldson Filtration Solution**
Energy-saving & user-friendly - New Ultra-Filter
Donaldson claim one can save a 3 to 4 digit sum on energy costs per annum with each Ultra-Filter. Simpler assembly and service through the basic new design of the filter housing, and is thus more efficient.
In addition, a new filter medium is used that repel oil and water at the surface thus keeping a large cross sectional area available for retention of particles.
For further information, please go to: www.the-new-ultra-filter.com

**STUFF 4...The Paintshop**
A catalogue of items of equipment for your paint department, from small Touch-up Bottles, Spraygun Maintenance Kits etc to Paint Thickness Gauges. Send for the descriptive brochure – Tel: 01676 532047, email: stuff4@power-tec.co.uk

**IMF News**

**New Members & Transfers**

**Affiliate**
Brodie, Alexander DARA, Perth
Bloxham, Alan Dunlop Equipment
Burt, Andrew Polestar
Fidahusein, Zahida
Fisher, Adam DARA, Perth
Hawkins, Richard DARA, Perth
Houghton, Faren AEM Ltd
Mackie, Andrew DARA, Perth
McGivern, David AJT ENG, Ltd
Murrell, Lee Pickersgill Electroplating
Palmer, Kevin Schloetter Company Ltd
Parker, Nicholas Filtronic
Parris, Hazel Trimite
Taylor, Simon Goodrich Aerospace
Van der Spuy, Tony South African Metal Fin.

**Member - MIMF**
Carey, John MAHLE Engine Systems

**Examination Results – September 2007**

**Foundation – Distance Learning**
Bennett, Richard # Schloetter Co Ltd
Bishop, Gary Dorsetware
Concannon, Lucy * Birmingham University
Hope, James # Tecan Ltd
Kernaghan, Gary Hawker Pacific Aero.
Latham, John # Tecan Ltd
Palmer, Kevin # Schloetter Co Ltd
Payne, Stephen * Deutsch UK
Percy, Matthew * Deutsch UK
Pheby, Joe # Tecan Ltd
Poole, Tony Hawker Pacific Aero.
Poulter, James # Deutsch UK
Smith, Martin Jay Jay Surface Finisher

**Plating Practice – Distance Learning**
Kenny, William * British Metal Treatment

**Foundation – Tutored Course – Seagate (Ireland)**
Baldrick, William #
Barr, Conor
Concannon, Matt #
Doherty, Eamon #
Gillespie, Stephen
Greene, Julie #
MacDonald, Liam
Obenndip, Divine #
* Pass with Merit # Pass with Distinction

**New Sustaining Members**

**Shanghai Electroplating Association**
960 Xhong Xing Road, Shanghai China 200070
Tel: 86-21-56323290, Email: sea@shea.cn The Shanghai Electroplating Association acts as a linkage between Government and the plating industry members supporting them in order to obtain legitimate approval and communicate with each other.

Scotsman Beverage Systems Ltd
Chancel Way, Halesowen Industrial Estate Halesowen, West Midlands B62 8SE
Tel: 0121 501 2566, Fax: 0121 585 6658
Scotsman Beverage Systems are one of Europe’s largest manufacturers and suppliers of drink dispensing equipment. They supply cooling and dispense equipment to the brewery and soft drinks industries.

Midland Branch/Organic Group
Tuesday 12 February 2008 at the Birmingham Medical Institute, Edgbaston, Birmingham
One-day Symposium and Tabletop exhibition entitled:
‘Surface Preparation and Pre-treatment’
Further details from IMF – tel: 0121 622 7387

Out and About

Surfex 2008 3 and 4 June 2008 at the Harrogate International Centre
Tribology 2008 – Surface Engineering of Automotive Powertrains for Environmentally Friendly Transport
8 – 10 July 2008. Call for Papers to: Lisa Rist at: l_rist@imeche.org