HAZARDOUS WASTE
Brief Guide

ENVIRONMENT AGENCY

Mixed wastes and mixing of waste

Using this Guide

This brief guide has been produced as a result of queries received by the Environment Agency. The information in this guide represents our current understanding and our position may be subject to change in the light of regulatory or case law changes, future Government guidance or experience of regulating this type of waste.

This guide must be read in conjunction with our enforcement policy and functional guidelines as well as our current enforcement priorities resulting from the implementation of the ban on co-disposal at landfills.

This guide is intended to offer advice on coding waste streams according to the European Waste Catalogue (EWC).

Waste Classification

The Duty of Care requires that waste is properly described to ensure its safe handling and that it is disposed of or recovered at an appropriately authorised facility. Since 1 September 2002, waste must also be classified according to the coding scheme provided in the EWC. Further guidance on this can be found in the Agencies' Technical Guidance WM2.

The EWC states that more than one code may be necessary to properly describe a mixed waste. The description of the waste should include as many EWC codes as are necessary to accurately identify the individual waste streams which have been mixed together. Where the EWC identifies an appropriate code for mixed waste, this should be used. Where this code is not sufficient to fully describe the wastes which have been mixed, other codes should be used in addition to that entry.

General Principles

It is not good practice to mix hazardous and non-hazardous waste, except under the terms of an authorisation. It is good practice to segregate wastes at source wherever practicable, for example, by providing a separate receptacle for fluorescent tubes.

Although many producers generate mixed wastes, the **deliberate** mixing of hazardous with non-hazardous waste in order to dispose of the hazardous waste as non-hazardous waste is not acceptable

Classification of the municipal waste stream

Municipal waste is categorised as waste from households and similar wastes from commercial, industrial and institutional sources.

Waste from households is made up from a wide variety of different components, some of which are hazardous. For waste to be similar to wastes from households it should be similar in both composition and quantity.

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Wastes that are similar to one component of waste from households, but which may be produced in much greater quantities are not included. For example, drums of solvents such as acetone or ethyl acetate are not municipal waste even though small quantities of nail varnish remover containing these solvents may appear in waste from households. A small quantity of nail varnish would be considered a component of municipal waste and the mixed load should still be coded as:

20 03 01 ***Mixed Municipal Waste***

This 6-digit code is not marked with an asterisk, so mixed municipal waste is not regarded as hazardous. It is recognised that some minor quantities of hazardous waste may arise within non-household municipal waste. In these cases it is accepted that these incidental arisings of hazardous waste will not be sufficient to alter the non-hazardous classification of the mixed municipal waste.

Where hazardous waste has been deliberately mixed with non-hazardous waste in order to dispose of the hazardous waste as non-hazardous waste, it is not acceptable to use this code

to avoid the correct classification.

For example, where waste contains fluorescent tubes in such numbers that it is different in either composition or quantity from waste from households, the code 200301 cannot be applied.

Where fluorescent tubes are collected separately, for example in bulk as part of maintenance activity, these would constitute a separately collected fraction and would be required to be treated as such. The EWC code for this separately collected fraction is

200121* fluorescent tubes and other mercury containing waste

This 6-digit code is marked with an asterisk, therefore separately collected fluorescent tubes are regarded as hazardous waste.

Classification – where a waste component which is hazardous is mixed with municipal waste, for example, at a civic amenity site.

The considerations above apply where such components of municipal waste are placed in a container of mixed municipal waste.

Local authorities should provide facilities for the separation of hazardous household wastes. At a civic amenity site, where separate facilities for hazardous household waste are not provided, e.g. at remote, rural sites, then the public should be encouraged to take hazardous items elsewhere. Some hazardous components will be deposited in mixed waste, even at sites with separate facilities. Provided that commercial maintenance and replacement waste is excluded and the contents of the container can still be properly described as mixed municipal waste, then it is non-hazardous.

Example

Oil contaminated wastes from spill clearance

The deliberate mixing of absorbent used to mop-up an engine oil spill with general office waste will generate a mixed hazardous and non hazardous waste. The whole load will be classed as hazardous unless the waste oil/absorbent mix is separated from the general mixed waste. Where the waste is not separated it should be coded using two codes as follows:

20 03 01 ***mixed municipal waste***, and

15 02 02* ***absorbents, filter materials (including oil filters not otherwise specified), wiping clothes, protective clothing contaminated by dangerous substances***

Where hazardous wastes are treated by deliberate mixing with non-hazardous wastes at an authorised waste management facility, the waste should be coded as follows:

19 02 04* ***premixed wastes composed of at least one hazardous waste***

Further information and assistance can be obtained from the following:

(i) **Your current waste management service provider**, as long as they have the expertise in advising on hazardous waste.

(ii) **The Environmental Services Association** - ESA has members providing waste management and waste related services to businesses in both the public and private sectors.

Contact ESA on www.esauk.org/directory/index.asp for their database of member companies. This directory allows you to search the database by company name, waste management service or county.

(iii) Envirowise – We recommend that all businesses review their waste management practices to consider the amount and hazardousness of the waste produced and identify opportunities to recover value through waste minimisation or recycling. The Government's Envirowise Programme offers small businesses a free and confidential "fastrack" waste minimisation audit to get you started. Envirowise advisors can help on a range of environmental issues, including hazardous waste. Its Environment and Energy helpline is Freephone 0800 585794 or via the website www.envirowise.gov.uk

(iv) Netregs.gov.uk - Clear regulatory and good practice advice on environmental issues for small businesses, tailored for their industry sector, can be found at www.environment-agency.gov.uk/netregs

(v) Information on **industrial waste minimisation** aimed at electronics and battery manufacture, tool processing, metals and metal finishing construction, minerals and inorganics can be found at www.mini-waste.com

(vi) WM2 Technical Guidance on the definition and classification of hazardous waste (WM2) can be found on the Environment Agency's website www.environment-agency.gov.uk/WM2

(vii) Letsrecycle.com – this is an independent news web site for business and a good source of information relating to changes in legislation. It also includes a searchable database of Waste Management Companies throughout the UK.

(viii) The **Chartered Institution of Wastes Management** (CIWM) – the professional body for waste managers offers simple "waste explained" advice and links to sources of support and information: www.ciwm.co.uk. The Institution is also the main waste skills training body offering courses on hazardous waste and a "hands-on operative" Waste Awareness Certificate amongst a much larger training programme.