



D3 CONSULTING

Decommissioning Decontamination Demolition



New Hazardous Waste Regulations Affect Demolition

The Environment Agency has made significant changes to the classification of Hazardous Waste (revision WM3 V3), with 30 changes to European Waste Catalogue (EWC) codes.

It is therefore more important than ever to make sure you are sampling and characterising waste correctly before demolition works to reduce costs and not be in breach of the new regulations.

Key changes to the EWC codes:

GREEN (for Mirror Non-Hazardous) which are the non-hazardous wastes;

BLUE (for Mirror) where the hazardousness depends on the threshold of any dangerous substances present; and,

RED (for Absolute) If an EWC code is an absolute entry, the waste will always be hazardous as there is no threshold below which the hazardous material can be discounted.

Note, where a code has changed from a mirror code (blue) to an absolute code (red), the waste will be hazardous if the equipment contains any amount of hazardous material or any hazardous components.

Changes of interest to demolition:

- **Polychlorinated Biphenyls (PCBs)** have changed from Absolute Hazardous to Mirror entry. This means that oils will only be considered to contain PCBs if they contain greater than 50ppm total PCBs. The oils will still be hazardous but the "containing PCBs" code should not be used.
- **Packaging waste and contents** has also changed from a mirror entry to an absolute entry for un-rinsed packaging contaminated with traces of hazardous chemicals or non-edible oils. For a waste container to be classified as packaging waste it must be effectively "empty" with all reasonable efforts made to remove any left-over contents. Be aware of empty oil drums - any residue deems the drum as hazardous for disposal.
- **Soil and other construction and demolition waste** containing or contaminated with asbestos will be hazardous if the asbestos content is greater than or equal to 0.1%. This 0.1% threshold applies to the whole waste if fibres are dispersed throughout the waste, or to the asbestos product if there are any identifiable pieces of asbestos product. This is an important clarification in WM2 V3, the assessment of the 0.1% threshold must be on the asbestos product alone if there are any identifiable pieces of asbestos, and if it is not possible to separate those pieces from the waste - the whole load will be hazardous.
- **For electrical devices** containing oils and fuels, lead acid battery, Ni-Cd battery, fluorescent tube

and asbestos then these wastes have changed from a mirror blue to an absolute red entry and will now be hazardous, regardless of the concentration of the hazardous component. Only removal of all hazardous components will make the item non-hazardous. Thus switchgear with flash-guards will now be hazardous until they are removed.

For support on your waste characterisation requirements then you are welcome to contact Kathryn Sentance on 01803 840 888 or Kathryn@d3-consulting.com.



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