Waste Management: Good practice guide for the UK lift industry

Prepared by LEIA Safety and Environment Committee

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Introduction

This document is intended to outline good waste management practice for the waste produced by the UK lift industry.

It is not intended as guidance to every aspect of environmental law applicable to waste, some of which differs throughout the UK, but rather to promote and encourage good practice and so avoid any damage to the environment. Members should speak to their HS&E Advisor/ Manager or the LEIA Safety & Training Manager for further advice and guidance.

What is waste?

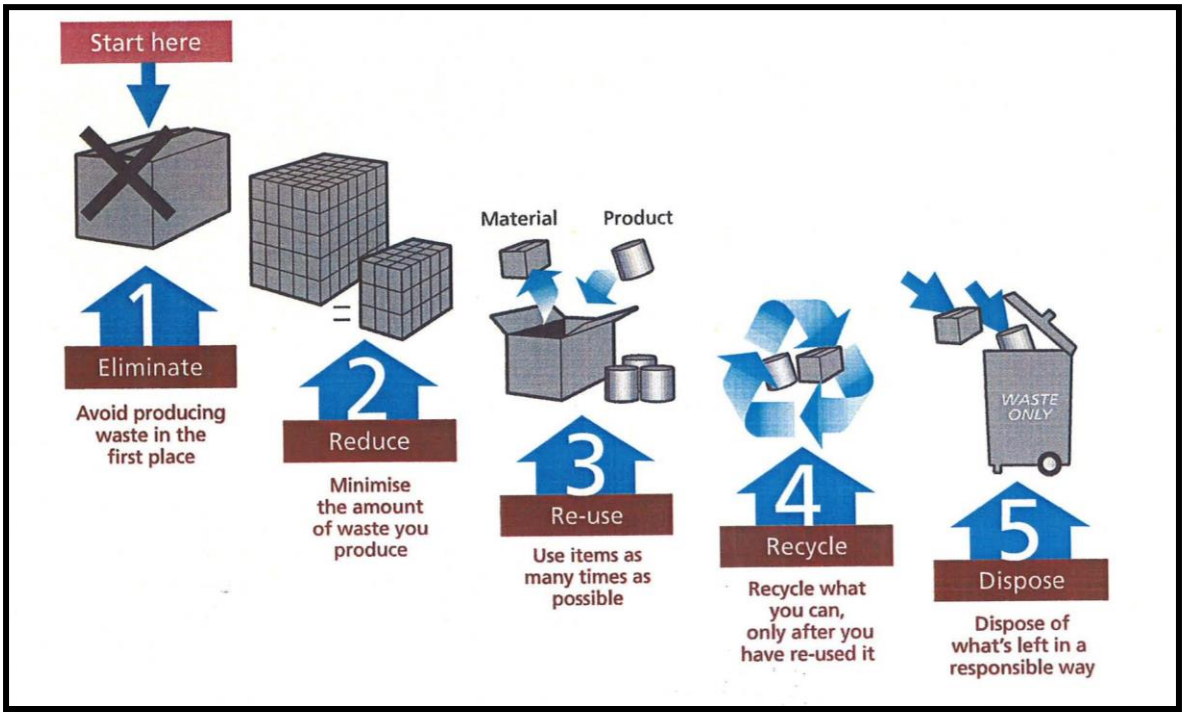
A material is considered to be waste when the producer or holder discards it, intends to discard it, or is required to discard it. Our activities on sites produce waste which, as part of our service to the customer, we dispose of.

Examples of waste in the UK lift industry include:

- Scrap metals
- Plastics
- Waste oil (including waste hydraulic fluid)
- Anything with any oil residue (oily rags, used absorbent granules)

Many businesses are unaware of how significantly waste impacts on their bottom line. As the demand for materials grows worldwide, raising input costs, it makes sense for businesses to adopt the waste hierarchy (see Figure 1), which ranks waste management options according to what is best for the environment. Top priority is given to preventing waste production in the first place. After that, once waste is created, priority is given to preparing it for re-use, then recycling, then recovery, and last of all disposal (e.g. landfill or incineration).

Figure 1 Waste Hierarchy of Control



Examples of how the waste hierarchy can be applied:

- Eliminate – check the amount of materials being ordered to avoid over ordering and consequent waste production
- Reduce – minimise packaging used to store and protect new equipment (e.g. glass, mirrors, finished surfaces)
- Reuse – any excess materials on the next job
- Recycle – scrap metal

Even when the hierarchy has been applied there will still be some waste remaining for disposal – what's important is that this waste is dealt with correctly.

Duty of care for waste

We have a duty of care for the waste we produce. This means we must:

- Ensure that any waste produced or stored by the company does not escape to the environment

Safeguards must therefore be in place to guard against:

- Accidental spillage or leakage of waste
- Waste or litter blowing away
- Scavenging by vandals, thieves, children or animals

Waste must only be transferred or removed by an authorised person. Any waste carriers to be engaged should provide a copy of their current Waste Carriers Licence before being used; a check can also be made using the public registers available on the Environment Agency (EA) website. All waste transfers must be accompanied by a written description in either a non-hazardous waste transfer note or hazardous consignment note so that persons further down the chain know what they are dealing with.

Hazardous and non-hazardous waste

The following are examples of hazardous and non-hazardous waste (Note: In Scotland the term Special Waste is used instead of Hazardous Waste although the requirements are very similar. In case of doubt seek advice).

Non-hazardous waste

- Paper
- Cardboard
- Metals
- Plastics

Hazardous waste

- Waste oil (including waste hydraulic fluid)
- Anything with any oil residue (oily rags, empty oil containers, empty lubricant aerosol cans, used absorbent granules)
- Waste lead acid batteries
- Waste fluorescent tubes
- Some waste electrical equipment

Queries as to whether a particular waste is hazardous or not should be referred to your HS&E Advisor/Manager who should have access to the European Waste Catalogue where all wastes are categorised and given a unique six figure code. Examples of waste categories and their applicable EWC codes are shown in Table 1 below:

Table 1 Example EWC Codes

Description of Waste	EWC Code
Mixed municipal waste	20.03.01
Mixed packaging	15.01.06
Wooden packaging	15.01.03
Metals	20.01.40
Mineral based non-chlorinated engine, gear and lubricating oils	13.02.05*
Synthetic engine, gear and lubricating oils	13.02.06*
Mineral based non-chlorinated hydraulic oils	13.01.10*
Synthetic hydraulic oils	13.01.11*
Absorbents, filter materials (including oil filters not otherwise specified), wiping cloths, protective clothing contaminated by hazardous substances	15.02.02*
Lead batteries	16.06.01*
Fluorescent tubes and other mercury containing waste	20.01.21*

*Denotes hazardous waste

Member premises & customer sites

The question arises:

Am I allowed to store waste at my premises prior to final collection and disposal?

The law says that any deposit of waste at business premises must be carried out either in accordance with an environmental permit or waste exemption.

It is envisaged that the type of waste storage undertaken by LEIA members would fall into two categories of waste exemption which do not require any kind of registration with the authorities.

These are called Non-Waste Framework Directive (NWFD) exemptions. The two NWFD exemptions that apply are:

1. NWFD 2 - Temporary storage of waste at the place of production i.e. at a customer's premises
2. NWFD 3 - Temporary storage of waste at a place controlled by the producer i.e. at a depot

The GOV.UK web site gives guidance on the terms and conditions that must be fulfilled for these NWFD exemptions to apply. For NWFD 2, waste can be stored for up to 12 months. For NWFD 3, waste can be stored for up to 3 months only.

Compacting waste streams such as cardboard, and separating recyclable materials such as paper and plastic are encouraged under these exemptions since these activities assist with waste transport and downstream recycling.

For LEIA members who store waste at their own premises (NWFD 3 would apply), the quantity of waste that can be stored at any one time under this exemption is:

1. Up to 50 m^3 of solid waste, and
2. Up to 1,000 litres of liquid waste e.g. oil

Clearly the volume of liquid waste that can be stored at any one time under NWFD 3 is quite low at 1,000 litres (the capacity of one intermediate bulk container (IBC) is 1,000 litres).

For LEIA members who store waste at a customer's premises (with the waste being produced there), there are no limits on the amount of waste that can be stored.

If a LEIA member needs to store more than the limits set out, they should consult their EH&S Advisor/Manager, as an S1 Exemption may be applicable. However, an S1 Exemption carries additional duties and responsibilities; must be registered with a regulator (e.g. EA), and a fee will be applied. In addition, S1 Exemptions require an Environmental Impact Assessment to be completed. The exemptions are summarised in Table 1 below.

Table 2 Summary of Exemptions

	S1 (member premises)	**NWFD 3 (member premises)**	**NWFD 2 (customer premises)**
Limits (amounts)	400m^3 (Non-hazardous Waste) 3m^3 (Hazardous Waste)	50m^3 (solid waste) 1000 litres (liquid waste)	No limit
Time (not more than)	12 months	3 months	12 months
Registration with Regulator	Yes	No	No

Moving materials from customer sites

Where materials are removed from customer's sites, possibly materials generated by our works, the following options are available:

1. A collection by a waste carrier – this will probably be for installation and refurbishment sites or where the bulk collection of hydraulic oil or larger quantities of materials which are considered as waste are involved.
2. Transportation in lift company vehicles to local member premises.

If operating the second option, and the material is hazardous waste, a Hazardous Waste Consignment Note will need to be completed for each item of waste. The Consignment Note will need to be completed at the point of production, before transporting to another location and must be processed in accordance with the Hazardous Waste (England and Wales) Regulations 2005 or (in relation to Wales), the Hazardous Waste (Wales) Regulations 2005. See Appendix 1 for details of Hazardous Waste Consignment Notes.

It is recommended that the member registers as a waste carrier. This is now a two tier system and it is suggested that LEIA members would normally be considered as upper tier carriers for which a fee is payable. Registration with the regulator must be renewed every three years.

When transporting liquids from site in company vehicles, precautions need to be taken against accidental spillage – for example by carrying a suitable spill kit or by placing containers within a leak proof plastic box. Some members may prefer to limit the amount of liquid transported and have quantities in excess of their limit transported by a specialist.

Further requirements when moving hazardous waste

When hazardous waste is moved and a consignment note is used there is an additional requirement to make a consignee return to the EA on a quarterly basis, detailing all the movements of hazardous waste and pay the appropriate fees to the EA.
The Process of consignee returns is explained in guidance found on the EA website.
https://www.gov.uk/dispose-hazardous-waste/consignee-returns

Storing waste at member premises

Segregation during storage

It is a legal requirement to ensure that all waste is stored safely and securely. In addition, the mixing of waste is prohibited in UK Law. Members must therefore have reliable segregation procedures in place to stop mixed waste being produced. Specifically, it is prohibited to mix:

- A hazardous waste with a non-hazardous waste (e.g. oily rags with cardboard in a wheelie bin)
- Different types (categories) of hazardous waste with each other (e.g. hydraulic oil with oil containing PCBs in a drum/tank)

Safe storage

Some simple waste management procedures which will help members comply with the law are:

- Storing waste in a secure place using suitable containers that will stop waste escaping
- Labelling containers clearly with the type of waste they contain
- Storing:
    - Oily rags in a separate wheelie bin
    - Greases/lubricants and other small items of hazardous waste in a COSHH (Control of Substances Hazardous to Health) compliant cupboard
    - Batteries in a battery box
    - Fluorescent tubes in a fluorescent tube coffin
    - Waste electrical electronic equipment (WEEE) in a separate box/bin/skip
    - Wood and scrap in separate skips
- Separating recyclable materials such as paper, cardboard and plastic into separate wheelie bins or utilising a “mixed recyclables” bin.
- Storing waste oil in tanks or containers which are of sufficient strength and structural integrity to ensure that they are unlikely to burst or leak in ordinary use.

  Tanks must be situated within a secondary containment system with a capacity of not less than 110% of the tank’s storage capacity (note: if there is more than one tank within the system, the containment system must hold not less than 110% of the largest container’s storage capacity or 25% of their aggregate storage capacity, whichever is the greater). Where any drum is used for the storage of oil in conjunction with a drip tray as the secondary containment system, it is sufficient if the tray has a capacity of not less than 25% of the drum’s storage capacity; or if there is more than one drum used at the same time with the tray, 25% of the aggregate storage capacity of the drums.

The figures below show waste storage options.

Figure 2 Skip Waste Storage

Figure 3 Wheelie Bin Waste Storage

Figure 4 Bunded Liquid Storage

Figure 5 COSHH Cupboard

Moving waste from member premises

You must use a licensed waste carrier and you must check they are registered either by obtaining a copy of their waste carrier licence from them directly or viewing the licence online via the EA website. Using a well-known and established national carrier may give you some comfort but you should still check they are correctly licensed.

Depending on the type of waste being collected, the carrier will provide either:

a) A non-hazardous waste transfer note
b) A hazardous waste consignment note

Remember you are employing the carrier to remove the waste and provide the documentation. You should do as much as you can to check the information contained within the note is accurate and if in doubt do not sign the note until the inaccuracy has been corrected. Many of these notes are now pre-printed/ IT generated but this does not mean they are accurate. Figures 6 and 7 show the information required on non-hazardous waste transfer notes and hazardous waste consignment notes.

Members should note that extra duties apply for hazardous waste management which include:

- Using only authorised businesses to recycle or dispose of hazardous waste
- Filling in hazardous waste consignment notes correctly and keeping them for 3 years (as opposed to 2 years for non-hazardous waste transfer notes).
- In Scotland only, waste carriers must notify the Scottish Environment Agency (SEPA) in advance of collecting and transporting your hazardous waste
- In Wales only, if you produce more than 500 Kg of hazardous waste per year you must be registered with Natural Resources Wales (NRW) as a Hazardous Waste Producer
- Keeping hazardous waste compliance documentation sent to you from businesses that receive your waste (called hazardous waste returns)

Figure 6 Example of a Non-Hazardous Waste Transfer Note for waste that is transferred from a member's premises to a third party disposal site

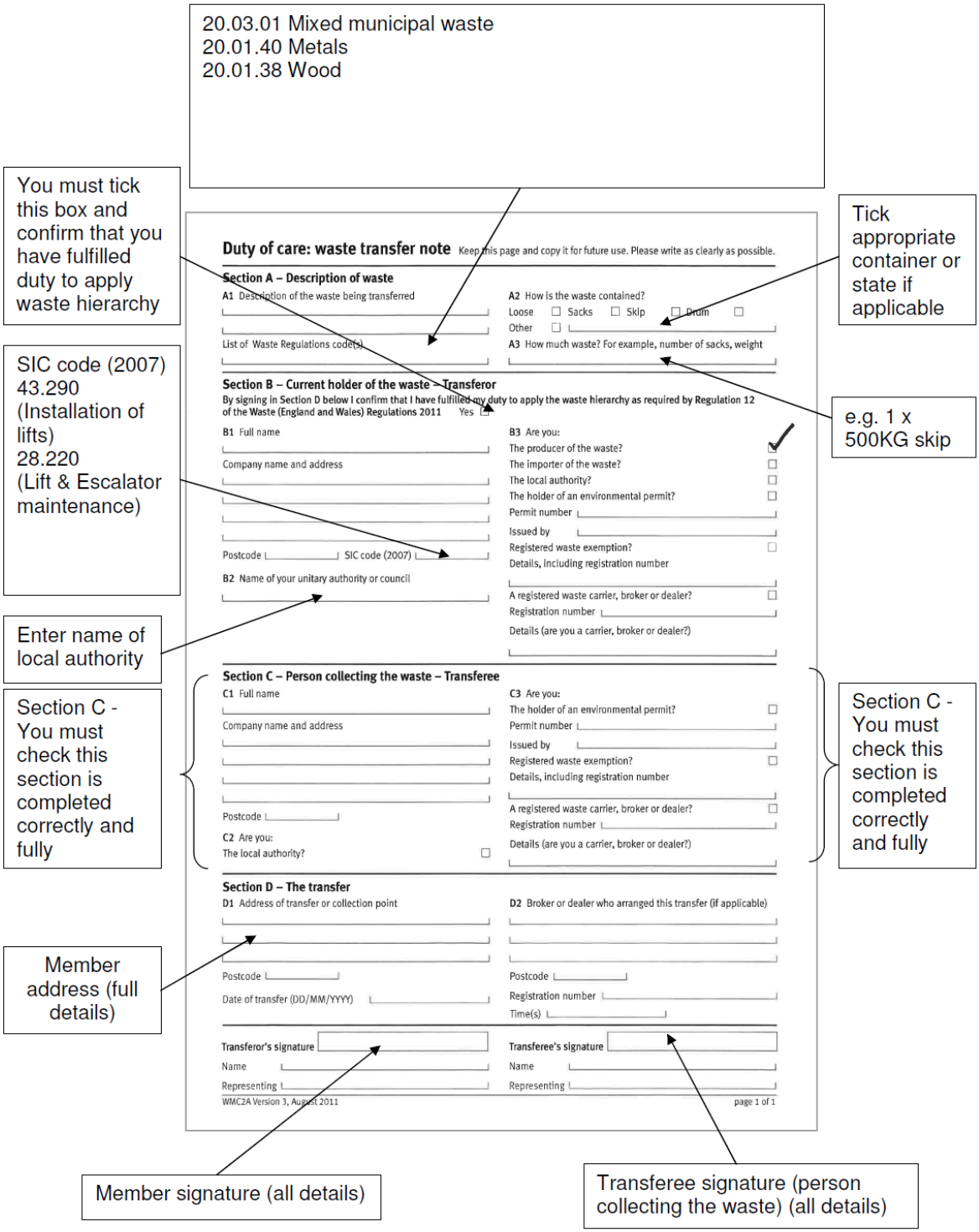
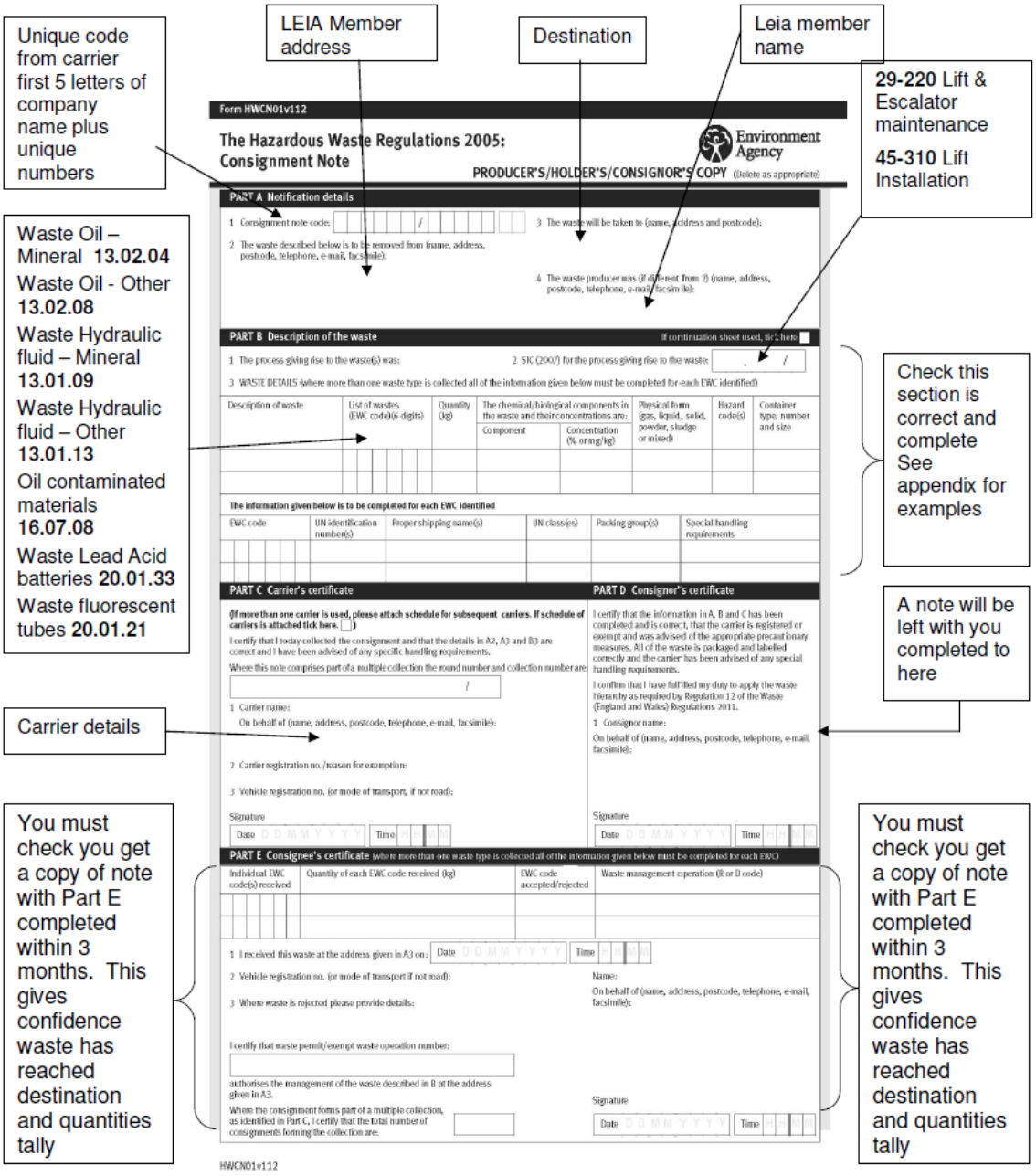


Figure 7 Example of a Hazardous Waste Consignment Note for waste that is transferred from a member's premises to a third party disposal site



For further explanation see Appendix 1

Conclusion

Waste management is an important part of members' legal compliance duties. By following this LEIA good practice guide and other guides produced by waste regulators you will go a long way to ensuring that your business delivers minimal negative impact on the global and local environment. In addition, you will be implementing best practise that will meet the expectations and demands of your internal and external stakeholders, which include the Environment Agency and Local Authorities.

References

European Waste Catalogue codes:
https://www.gov.uk/how-to-classify-different-types-of-waste/overview

Non Waste-Framework Directive exemptions:
https://www.gov.uk/government/collections/waste-exemptions-storing-waste#storing-waste-exemptions-s1-s2-s3

Waste carrier registration:
https://www.gov.uk/waste-carrier-or-broker-registration

Check waste carriers licence (also Upper/ Lower tier definitions):
https://environment.data.gov.uk/public-register/view/search-waste-carriers-brokers

Consignment Note returns:
https://www.gov.uk/dispose-hazardous-waste/consignee-returns

Hazardous Waste Consignment Note Proforma:
https://www.gov.uk/government/publications/hazardous-waste-consignment-note

The Waste (England and Wales) Regulations 2011

Section 33 of the Environmental Protection Act 1990

The Environmental Permitting (England and Wales) Regulations 2010 (EPR)

The Waste (England and Wales) Regulations 2011

The Hazardous Waste (England and Wales)Regulations 2005

The Hazardous Waste (Wales) Regulations 2005

The Control of Pollution (Oil Storage) (England) Regulations 2001

APPENDIX 1

Hazardous Waste Consignment Note Process

This is a suggested process to comply with the Hazardous Waste Regulations, using paper Hazardous Waste Consignment Notes. Other commercial process systems are available or you could use your own internal process.

In situations where hazardous waste is removed from site and carried in your own vehicle to your own premises, you will be:

- The producer of the waste (the consignor)
- The carrier of the waste
- The receiver or the waste (the consignee)

In this situation you will need to complete all sections of the Hazardous Waste Consignment Note (HWCN).

Parts A-D must be completed before the waste leaves the site, with part E being completed once the waste arrives at the premises.

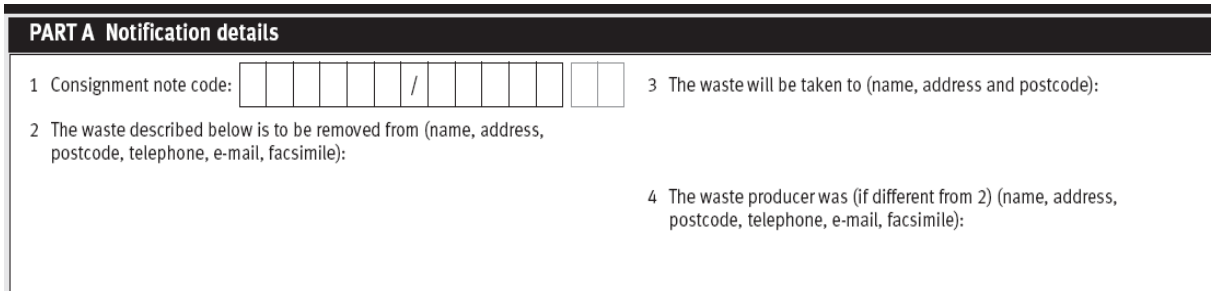
Where a commercial waste carrier is used, they will supply the HWCN and will complete parts A, B and C based upon information we provide. You will need to complete and sign part D.

Where you are carrying the waste between premises, you will need to complete parts A to D.

Guidance on completing consignment notes

The following guidance notes apply to completing a HWCN where you are consigning hazardous waste. Read these in conjunction with the example consignment note (Figure 7). These HWCN are probably most conveniently filled in by hand but you are free to adopt any method provided all the necessary information is included

Part A – Notification details



Item 1

The consignment code is the first six letters of the name of the company followed by five unique letters or numbers. These can be anything but it must be a unique code for each movement of waste. It is suggested consecutive numbers with branch identifier are issued by the person with responsibility for waste within the individual branch.

Item 2

The address of the premises including all details

Item 3

Where the waste is being taken to including all the details.

Item 4

Insert “As 2” here indicating you are the producer

Part B – Description of waste

PART B Description of the waste — If continuation sheet used, tick here ☐

1 The process giving rise to the waste(s) was: 2 SIC (2007) for the process giving rise to the waste: . /

3 WASTE DETAILS (where more than one waste type is collected all of the information given below must be completed for each EWC identified)

Description of waste	List of wastes (EWC code)(6 digits)	Quantity (kg)	The chemical/biological components in the waste and their concentrations are:		Physical form (gas, liquid, solid, powder, sludge or mixed)	Hazard code(s)	Container type, number and size
			Component	Concentration (% or mg/kg)			

The information given below is to be completed for each EWC identified

EWC code	UN identification number(s)	Proper shipping name(s)	UN class(es)	Packing group(s)	Special handling requirements

Tick in the top right-hand box indicating if a continuation sheet has been used (See Figure 8).

Complete B1 and B2, these will be

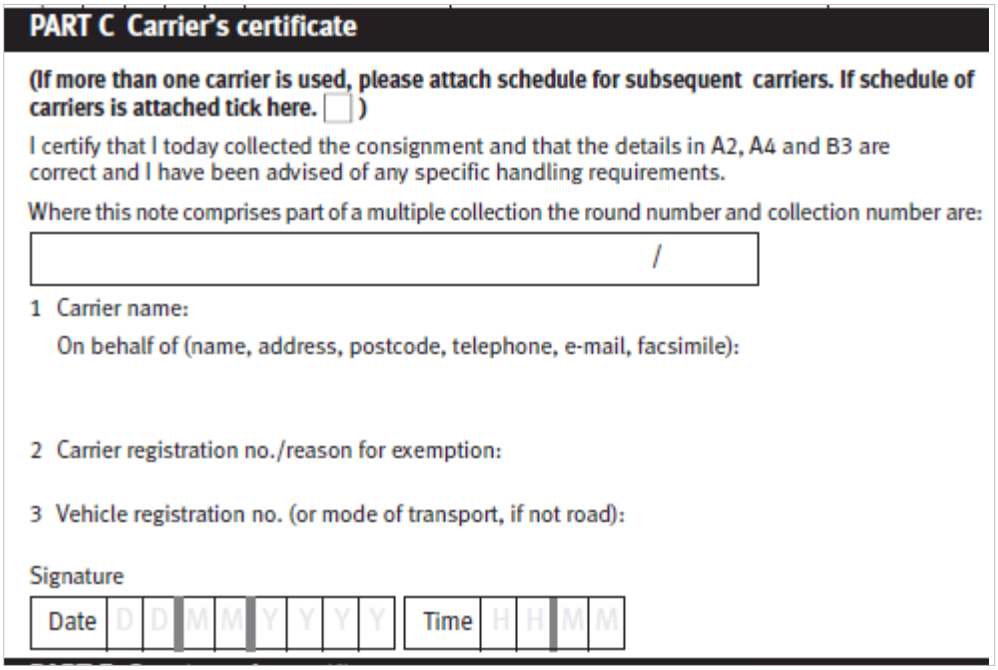
B1 – Process	**B2 - SIC Code**
Lift and escalator maintenance	28.220
Lift installation*	33.200

There is no code covering stairlifts so use the above codes as appropriate

Then either use the suggested continuation sheet in Figure 8 in which case you will only need to fill in the shaded areas with the quantity in Kg or litres and the container type and size (e.g. 4 x 25 litre drums) or enter the information from the continuation sheet into part B3 Waste Details.

Part C – Carriers certificate

If you are the carrier then your details go here including carrier registration number, vehicle registration number, driver's signature and date.



PART C Carrier's certificate

(If more than one carrier is used, please attach schedule for subsequent carriers. If schedule of carriers is attached tick here. ☐)

I certify that I today collected the consignment and that the details in A2, A4 and B3 are correct and I have been advised of any specific handling requirements.

Where this note comprises part of a multiple collection the round number and collection number are:

/

1 Carrier name:

On behalf of (name, address, postcode, telephone, e-mail, facsimile):

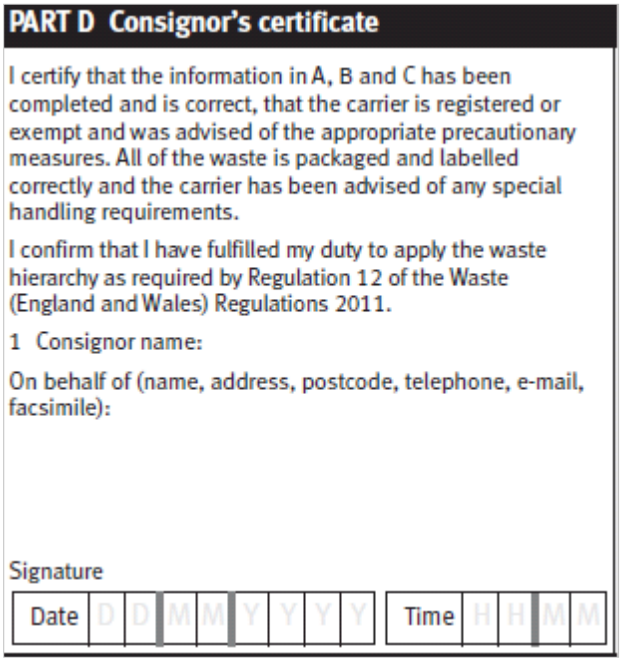
2 Carrier registration no./reason for exemption:

3 Vehicle registration no. (or mode of transport, if not road):

Signature

Date D D M M Y Y Y Y Time H H M M

Part D – Consignor's certificate



PART D Consignor's certificate

I certify that the information in A, B and C has been completed and is correct, that the carrier is registered or exempt and was advised of the appropriate precautionary measures. All of the waste is packaged and labelled correctly and the carrier has been advised of any special handling requirements.

I confirm that I have fulfilled my duty to apply the waste hierarchy as required by Regulation 12 of the Waste (England and Wales) Regulations 2011.

1 Consignor name:

On behalf of (name, address, postcode, telephone, e-mail, facsimile):

Signature

Date D D M M Y Y Y Y Time H H M M

Consignee responsibilities

When waste is returned to the branch it must be accompanied by the HWCN completed part A-D.

The person responsible for waste needs to complete Part E of the note. This forms confirmation that all the waste that left the customers premises arrived at our premises.

Individual EWC codes are per the continuation sheet (Figure 8)

Quantity of each type of waste: should be the same as that on the continuation sheet

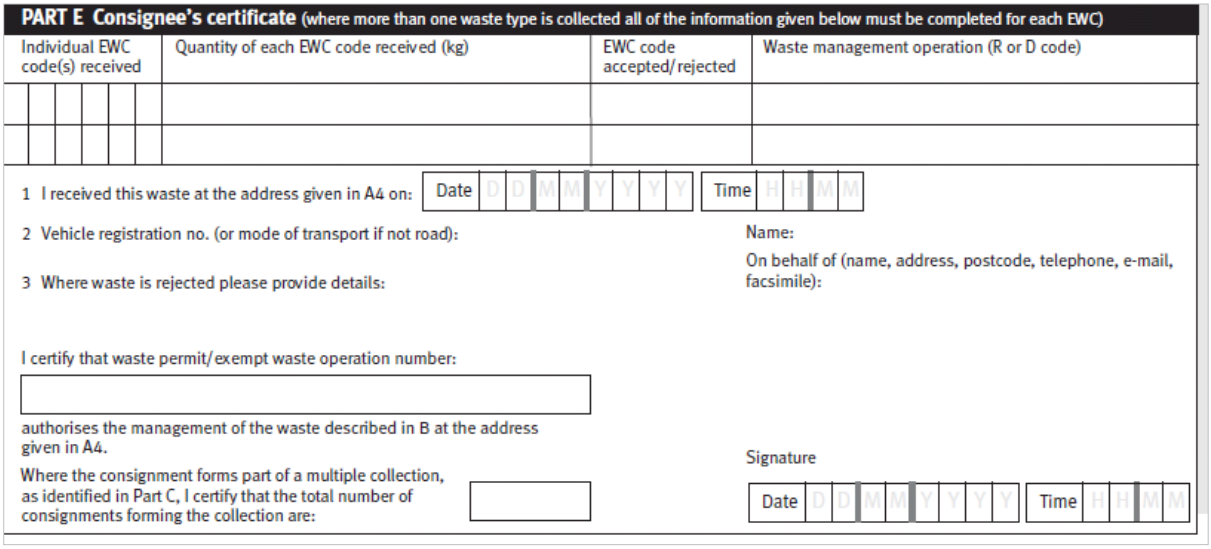
EWC accepted/rejected: it should always be listed as accepted.

Waste management operation R/D code: Recovery or disposal. Use either R13 or D13 which indicates the waste is to be stored prior to recovery or disposal

Waste management operation	**R/D code**
Waste is to be recovered (typically recycled)	R13
Waste destined for landfill	D13

1. Give time and date of receipt
2. Vehicle registration is auto completed
3. The wastes listed will not be rejected
4. Give your name and sign, date and time

Part E Consignee's Certificate



PART E Consignee's certificate (where more than one waste type is collected all of the information given below must be completed for each EWC)

Individual EWC code(s) received	Quantity of each EWC code received (kg)	EWC code accepted/rejected	Waste management operation (R or D code)

1 I received this waste at the address given in A4 on: Date D D M M Y Y Y Y Time H H M M

2 Vehicle registration no. (or mode of transport if not road):

Name:

3 Where waste is rejected please provide details:

On behalf of (name, address, postcode, telephone, e-mail, facsimile):

I certify that waste permit/exempt waste operation number:

authorises the management of the waste described in B at the address given in A4.

Where the consignment forms part of a multiple collection, as identified in Part C, I certify that the total number of consignments forming the collection are:

Signature

Date D D M M Y Y Y Y Time H H M M

Record keeping

All HWCN should be kept for a minimum of 3 years.

Some customers may request a copy of the note – if so, it is essential Part E is completed giving them assurance the waste has been treated correctly.

Suggested Continuation Sheet (Including EWC Codes)

Description of waste	List of wastes EWC Code	Quantity (Kg)	Component	Conc. (% or g/kg)	Physical state	Hazard Codes	UN ID number	Shipping Name	UN Class	Packing Group	Handling	Container type and size
Waste Oil – mineral	130204		Oil	100%	Liquid	H7	N/A	N/A	N/A	N/A	PPE	
Waste Oil – other	130208		Oil	100%	Liquid	H7	N/A	N/A	N/A	N/A	PPE	
Waste hydraulic fluid –mineral	130109		Oil	100%	Liquid	H7	N/A	N/A	N/A	N/A	PPE	
Waste hydraulic fluid – other	130113		Oil	100%	Liquid	H7	N/A	N/A	N/A	N/A	PPE	
Oil contaminated materials	160708		Oil	10- 100%	Solid	H7	N/A	N/A	N/A	N/A	PPE	
Waste Lead acid batteries	200133		Lead/ Sulphuric acid	75%/25%	Solid	H8	2800	Batteries non spillable	8	3	Insulate terminals before handling	
Waste fluorescent tubes	200121		Mercury	2%	Solid	H6 H14	N/A	N/A	N/A	N/A	Transport within cardboard tube or similar	

Figure 8