

# Mis-Description of Wastes

In a report on the Government's consultation on Controls on the handling, transfer and transport of waste: The Duty of Care, misdescription of wastes was highlighted as follows: *"The Government is aware that there is a risk that some people or organisations may seek to deliberately misdescribe waste in order to avoid controls on, for example, hazardous waste. If the waste is hazardous, then the person either forging a waste transfer note or misdescribing the waste will have committed an offence under the Hazardous Waste Regulations 2005. Anyone forging a non-hazardous waste transfer note or providing an inaccurate description could also be committing an offence under existing legislation as they would not be providing an accurate description of the waste being transferred."*

Two results of the above consultation were:

- Changes to the Environment Agency (England & Wales) Permitting system to simplify permitting systems and reduce legislation
- Increase hazardous waste allowances from 200kgs p/a to 500kgs p/a before a premises code has to be obtained.

Employees should be aware that the mis-description of consigned hazardous wastes is a key issue in the waste management industry. However, it should not have to affect IT-Green as goods are collected at source, inventoried prior to collection and rarely received in a packed or containerized state.

However, the receipt of hazardous wastes, mis-described as non hazardous may be an issue in the future. Computers older than 25 years would potentially contain hazardous components with PCB bearing Capacitors, but would be considered upon cursory inspection as being non-hazardous. It is because of this issue that employees need to be aware of the following hazardous materials:

## **The following contain PCB bearing Capacitors:**

Large computers with a manufacture date on or before 1985

Servers manufactured before 1985 (typically require 2 persons to lift)

Computer screens and televisions manufactured before 1985

## **The following materials are present in modern equipment:**

Lead: Computer monitors and screens of any age

Lead, Acids: Universal Power supplies

Ozone Depleting Substances: Computers labelled as being liquid cooled (these contain refrigerants)

Mercury: Flatbed scanners

Mercury: All-in-one Printers and photocopiers

Drivers operating for IT-Green are aware that they may collect additional items from clients that were not previously inventoried. However, in order to comply with the Hazardous Waste Regulations (2005) they are required to add these items to their consignment notice and duty of care notice prior to signing off by the consignor and consignee so that it is complete and to avoid the risk of prosecution. Note that damaged goods containing hazardous waste may cause contamination and there is a risk of injury/poisoning if handled incorrectly. PPE must be carried in vehicles and be available to operatives at all times.

IT-Green is the Trading name of ComputerDisplays (UK) Limited, Company Number: 5587345

All employees must be aware that licensing (permitting) issued in line with the Waste Electrical and Electronics directive (Statutory Instrument 2006 No. 3315) does not permit the degassing and capture of Ozone depleting substances. We may accept and transport fridges and freezers and those manufactured after 2002 will not contain ozone depleting CFCs or HCFCs (2002 No. 528 ENVIRONMENTAL PROTECTION The Environmental Protection (Controls on Ozone-Depleting Substances) Regulations 2002). However, all employees that suspect a refrigerating unit or freezer may have been accepted should notify Richard Johnson of the make, model and year of manufacture. Prior to any treatment, an assessment of the manufacturer's product details will be carried out to ensure compliance with legislation.

Goods/ processed materials sold for their resources including circuit boards, plastics etc must be transferred with an accompanying waste transfer or consignment notice- this balances the books so to speak. Goods refurbished in-house and sold do not require any transfer note. However, we have a DUTY OF CARE to ensure that the parties purchasing the goods are not exporting them.

### **To Summarise:**

Where goods are collected and items fall outside the agreed manifest, an inventory must be carried out and added to the consignment notices and duty of care notices by the driver.

Goods received at the treatment facility should be inspected and where found to be over 25 years in age or contain refrigerants, be notified to Richard Johnson so that a preventative inspection can be carried out prior to treatment.

Always consider your own health and safety first. Use PPE provided wherever you feel necessary.

Richard A Johnson



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