



Facilities Management - Management Services
Policy and procedure
Disposal of hazardous waste

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1 Policy

The aim of this document is to give guidance on how Royal Holloway University of London (RHUL) stores and disposes of hazardous waste. It applies to every member of staff who produces hazardous waste.

Our policy is that each department in RHUL is responsible for the safety of the waste they generate. This document describes the actions that you must take to make sure that hazardous waste is stored and disposed of legally and safely.

If you are unsure if your waste is hazardous or need more advice about how to store and dispose of it contact the one of the following:

- [Health & Safety Advisor](#)
- [Sustainability Officer](#)
- [Departmental Superintendent for Biological Sciences](#)

This procedure applies to College-generated hazardous waste only.

1.1 What is hazardous waste?

Some wastes are harmful to human health or to the environment, either immediately or over an extended period. We call them hazardous wastes.

If you produce hazardous waste, you have a legal duty to make sure it is stored and disposed of properly.

These legal requirements are laid out in the [Hazardous Waste \(England and Wales\) Regulations](#), which came into force on 16 July 2005.

Hazardous waste includes but is not limited to:

- chemicals (including garden chemicals and pesticides);
- clinical waste;
- non-edible oil and fats (including oil filters and oily rags);
- fluorescent tubes (including energy saving light bulbs);
- gas cylinders;
- bleach and some strong cleaning products;
- paint, solvents and varnishes;
- Ni-Cad, Lead and Mercury containing batteries;
- electrical equipment that contains hazardous components (e.g. cathode ray tubes in televisions, computer monitors and electronic display screens);
- asbestos.

You can find a complete list of materials classified as hazardous in the [Labelling and the List of Wastes](#) section of this document.

1.2 The legal requirements

The College is registered with the Environment Agency as a hazardous waste producer. A registered contractor must collect all hazardous waste we produce on site for disposal.

If you have an existing registered contractor to dispose of your waste, you must make sure that for each consignment of hazardous waste leaving the premises, you complete a consignment note displaying the premises code assigned to the College by the Environment Agency.

The College's premises code is **NBD309**.

Consignment notes must be held for a minimum of three years. Responsibility to ensure this happens lies with the:

- Assistant Director of Operations;
- Assistant Director of Estates;
- Head of the School of Biological Sciences
- or an appropriate person any of the above has nominated on their behalf.

1.3 Responsibilities

The College meets its statutory obligations through organisational arrangements.

The Assistant Directors of Operations and Estates and the Head of the School of Biological Sciences have overall responsibility for the safe storage and disposal of hazardous waste and for meeting the specific requirements identified in this policy and procedure.

However, they can pass day-to-day responsibility down to managers and supervisors. The management of hazardous waste at RHUL requires a partnership approach with responsibilities as defined in the following section.

Directors and Heads of Department have overall responsibility for the safe storage and disposal of hazardous waste and for meeting the specific requirements identified in this policy and procedure.

They should distribute this procedure in their area of responsibility and make sure that all their managers and deputies know and understand it.

Supervisors are responsible for making sure that all the staff in their areas, who work with hazardous waste, follow the guidelines under their supervision.

The Departmental Superintendent for the School of Biological Sciences is responsible for the annual registration of the College as a hazardous waste producer. Registration is with the Environment Agency.

1.4 Labelling and the European Waste Catalogue

You cannot mix different hazardous wastes and all hazardous waste must be kept separate from normal waste.

As soon as any hazardous substance becomes waste, it must be properly contained and labelled with its name, description and code from the European Waste Catalogue(EWC). The EWC categorises all hazardous waste by giving each a unique code.

A guide to classifying hazardous waste can be viewed in the guidance notes which accompany the [European Waste Catalogue](#).

- Find the waste category in the European Waste Catalogue.
- If waste is marked with an asterisk (*), it is hazardous.

An active inventory of all hazardous waste that a department is storing at any given time must be kept. If your department is storing hazardous waste you must make sure you have logged it with the School of Biological Sciences (see section 2.1 of this document).

1.5 Environment Agency audit

As the legally defined regulator, the Environment Agency is required to and may inspect premises.

They are not required to stay within the limited remit of hazardous waste auditing when on site and may raise any issue of environmental regulatory compliance that they encounter.

The consequence of failing to deal with any of the issues raised here or in the legislation is defined within the Regulations. Fines for non-compliance can reach £5,000.

2 How to dispose of hazardous waste

You must use a registered contractor to dispose of your hazardous waste legally and safely.

Currently there are three ways of disposing of different types of hazardous waste in the College, through:

- the School of Biological Sciences;
- Estates Services; or
- Accommodation Services.

2.1 School of Biological Sciences (SBS)

Departments can dispose of the following items through the School of Biological Sciences:

- chemicals - this includes garden and other chemicals and pesticides that are used on site;
- clinical waste - any waste which consists wholly or partly of human or animal tissue; blood or other body fluids; excretions; drugs or other pharmaceutical products; swabs or dressings; syringes, needles or other sharp instruments;
- bleach and strong cleaning products;
- paint, solvents and varnishes;
- batteries;
- fluorescent tubes that have not been provided by Estates Services;
- gas cylinders - can usually be returned to the supplier for re-filling. Any exceptions to this must result in the cylinders being disposed of through the School of Biological Sciences; and
- non-edible oil and fats - including oil filters and oily rags.

To arrange delivery of departmental hazardous waste to the disposal store contact the **Stores Controller**, Robert Prouse, on extension 3364 or School Superintendent Jacqueline Kolkowski on extension 3391.

You must clearly label all items for disposal with:

- a precise description of the waste;
- the European Waste Catalogue code;
- the department it has come from; and
- the date it is taken to the disposal store.

The Stores Controller will record receipt of your items and store them until they are collected by a licenced contractor. In the case of large drums of waste, the Stores

Controller may ask you to store the waste within your department until a collection is arranged. This waste will still be logged.

There is a charge for the disposal of hazardous waste so you will have to provide a cost code on delivery of your items. If the waste is being stored in your department you will be asked for a cost code when you log your item with the SBS.

2.2 Estate Services

Estate Services dispose of the following materials:

- fluorescent tubes (following bulb replacement)
- small scale* incidences of asbestos
- large batteries (such as vehicle batteries)

Contact the [FM non-residential customer services desk](#) to arrange a collection.

*the scale of asbestos removal will be decided following a visit from Estates Services. They will advise whether a specialist contractor is required to remove the asbestos or whether it can be done by the Estates Services team.

2.3 Accommodation Services

Accommodation Services is responsible for the removal and disposal of the following hazardous electrical equipment:

- televisions;
- computer monitors;
- other display screens;
- fridges, freezers and other refrigerated items*

* Refrigerated items from laboratories must be cleaned, decontaminated in accordance with the COSHH procedure and accompanied by the decontamination certificate which must be signed by the Departmental Health & Safety Coordinator.

To request a porter to come and collect your electrical item contact the Accommodation Services Assistant Manager on extension 6133 or complete a [portering request on-line](#).

3 Best practice

3.1 Paint and varnish residues

Good practice is to leave lids off tins and containers in a well-ventilated area until the contents have dried up and then to dispose with normal rubbish.

4 Implementation checklist

4.1 Review period

The author will review this document every twelve months, with input from reviewers and contributors.

4.2 Other divisions/ teams within FM

This document has an impact on all producers of hazardous waste:

- Estate Services;
- Operations; and
- Academic departments.

Contributors from three divisions of FM produced this procedure and it reflects their views. See Contributors in the document control section.

4.3 Customers

This is a College wide procedure that is relevant to every member of staff. By staff following this policy and procedure the College fulfils its legal obligations for the disposal of hazardous waste.

4.4 Other College stakeholders

None

4.5 Trade unions

Trade unions and their members are to be considered as part of every policy and procedure. There are no further issues regarding the implementation of this policy and procedure.

4.6 Impact assessment

A primary impact assessment has been completed and added to the appendix.

4.7 Risk assessment

The procedure is associated with X procedure for the handling of hazardous materials.

4.8 Other legislation

Hazardous Waste (England and Wales) Regulations 2005

4.9 Finance and resources

There is a cost associated with the disposal of hazardous waste as it is not covered under the College's standard waste contract. The School of Biological Sciences must dispose of stored waste at least annually and must pay for this service. Departments wishing to dispose of hazardous waste may be asked to provide a cost code.

4.10 Sustainability

The policy and procedure will make sure that waste that is hazardous to the environment and health does not end up in landfill sites.

4.11 Best practice

This policy and procedure contains guidance on best practice for plain English.

4.12 Training and support

All staff that produce of hazardous waste will need to be aware of this procedure. Training should be provided where appropriate.

4.13 Other areas

No issues.

4.14 Planning ahead – areas to review

Continue to monitor Hazardous Waste (England and Wales) Regulations 2005. Continue to review best practice use of plain English.

4.15 Document sensitivity

This document is suitable for **open** distribution.

5 Appendix

More information about hazardous waste is available on the following websites:

[The Environment Agency](#)
[Defra](#)

The European Waste Catalogue <http://publications.environment-agency.gov.uk/pdf/GEHO1105BJVS-e-e.pdf>

5.1 Equality Impact Assessment (EQIA): Initial Screening Form

Name of the policy, service or project:
(Referred to just as 'policy' herein) Policies and procedures

Team: Facilities Management

a. Preparation

The work on this section should be done in advance and be used as part of your EQIA. Please attach examples of available monitoring information, research and consultation reports.

1. Do you have monitoring data available on the number of people who are using or impacted upon by your policy?

- Number of people with disabilities
- Black and minority ethnic communities
- Women and men

Yes	No
<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>

If you have answered 'Yes' to the above questions your monitoring data should be compared to the current available census data to see whether a proportionate number of people are taking up your service.

2. If monitoring has NOT been undertaken, will this be done in future? N/A
(Race Relations Amendment Act, 2000)

Yes	No
<input type="checkbox"/>	<input type="checkbox"/>

If so, specify the arrangements you intend to make; if not, please give a reason for you decision:

3. If you are aware of any relevant local or national equality or diversity-related consultation, research, or good practice guidance, then please list and attach here:

Plain English, EO monitoring by College's EO advisor.

Yes	No
<input checked="" type="checkbox"/>	<input type="checkbox"/>

b. Your policy, service or project

1. **What is the main purpose of the policy?**
To ensure that waste that is hazardous to either the environment or human health is contained properly when stored and is disposed of as specified in the Hazardous Waste Regulations 2005.

2. **List the areas of activity of the policy, e.g. the recruitment strategy might have advertising, interviewing, short listing etc. as activity areas.**
Hazardous waste identification, correct containment, transfer to storage site, and correct disposal.

3. **Who are the main beneficiaries of the policy?**
All staff and customers of FM

4. **Is the policy corporate and far-reaching?** Yes Maybe No

5. **In your view, does the policy assist residents in meeting their most basic needs, i.e. shelter and income?**
N/A Yes No

6. **What number of people may be affected by the policy?** Directly: 200

7. **Are you expecting to make any changes to the policy during the next year?** Yes No

c. The Impact

1. Complete the following tables using ticks.
 Consider the information gathered in Section (a) of this Screening Form, comparing monitoring information with census data, and considering any earlier research or consultations. You could also look at section _ of the EQIA Guidance Notes for areas of possible effect:
- Where you think that the policy could have a negative impact on any of the equality target groups, i.e. it could disadvantage them
 - Where you think that the policy could have a positive impact on any of the equality target groups or contribute to promoting equality, equal opportunities, or improving relations within equality target groups

a) Does the policy affect men and women in different ways, e.g. flexible working arrangements might have a positive impact on women with caring responsibilities

Gender	Positive impact	Negative impact	Neutral	Reason
Women	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Men	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

b) Do people from different black and minority ethnic communities use services differently, e.g. could women from certain minority communities use a swimming pool more often if same sex swimming arrangements are in place?

Race	Positive impact	Negative impact	Neutral	Reason
Asian or Asian British (including Tamil, Gujarati and Korean)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Black or Black-British	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Chinese and other	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
White (including Irish)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

c) How will the policy impact on people with disabilities, e.g. if information about our services are not made available in large print or alternative formats, access to such services might be denied to people with a visual impairment or learning disability.

Disability	Positive impact	Negative impact	Neutral	Reason
Visually impaired	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Large print available and electronic storage
Hearing impairment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Physically disabled	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Learning disability	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Plain English allows clearer communication and understanding
Mental health problem	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

If the negative impact is potentially discriminatory and not intended and/or of high impact, you must complete a full Equality Impact Assessment.

2. a) **Could you minimise or remove any negative impact that is of low significance? N/A** Yes No
 Explain how
Gender: _____
Race: _____
Disability: _____

b) **Could you improve the positive impact?** Yes No
 Explain how
Gender: _____
Race: _____
Disability: _____

3. **If there is no evidence that the policy promotes equality, equal opportunities, or improved relations, could it be adapted so that it does? N/A** Yes No
 Explain how
Gender: _____
Race: _____
Disability: _____

4. **As a result of this initial screening, what is the impact of your policy on the equality target groups?** Low Me- High
 dium

5. **Is progression to a full impact assessment required?** Yes No

Signed _____
 Date: _____

Position _____

Equality Impact Assessment: Action Plan

Please list below any recommendations for action that you plan to take as a result of this impact assessment.

Issue	Action Required	Lead Officer	Time-scale	Resource implications	Comments