

KNOWLEDGE GUIDE SERIES

DEALING WITH ASBESTOS CONTAMINATED ORGANIC WASTE, AS A PROBLEMATIC WASTE STREAM (PWS)

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This guide has been produced to help raise awareness and provide guidance on dealing with asbestos waste contaminated with a high concentration of organic material.



5 minute read

Information in this document includes:

What is a problematic waste stream?

How is it regulated?

What can you do if you have this type of material?

CONTENTS

The background to the problem

What is a Problematic Waste Stream (PWS)?

Why is 'asbestos contaminated with a high concentration of organic waste' a problem?

How is it regulated?

What can you do if you have this type of material?

Why can it be more expensive than dealing with asbestos waste?

Why you can rely on Windsor Waste Management?

Background

Historically, asbestos removal companies have placed a mixture of asbestos and general (organic) wastes into containers designated for asbestos. Even though this has incurred higher costs, with asbestos waste charged at a higher rate than general waste, this has largely become accepted as common practice over the years where there are low levels of organic material contained within an asbestos load.

However, this practice was highlighted as an issue by the Environment Agency (EA) some years ago, when the EA started to carry out spot checks on the loads when they were being tipped at asbestos landfills.

What they witnessed was significant volumes of general (organic) waste being tipped into asbestos cells which led to a review and clampdown of current practices. As such, it is now the Environment Agency's stance that '**asbestos contaminated with a high concentration of organic material**' should be treated as a Problematic Waste Stream (PWS).

What is a Problematic Waste Stream?

There are a number of different reasons or circumstances in which waste can be classified as a Problematic Waste Stream:

- Orphan waste - one that does not have a home
- Fails Waste Acceptance Criteria (WAC) for disposal into landfill
- It doesn't have a clearly designated disposal route
- Does not conform to licencing conditions
- If waste is not dealt with and consigned correctly on the paperwork, it can cause issues at the disposal facility resulting in loads being rejected and returned to site

Here are some examples of '**asbestos contaminated with a high concentration of organic material**' that would need to be treated as a problematic waste:



Asbestos contaminated fly tip waste



Asbestos contaminated fire/ water damaged waste



Asbestos contaminated plasterboard waste



Asbestos contaminated timber waste

Why is this waste type a problem?



Asbestos waste has to be disposed of at a landfill facility which has a Stable Non-Reactive Asbestos Cell.

Stable Non-Reactive Asbestos Cells are designed and managed differently from cells that receive general (organic) waste because asbestos waste does not decompose and does not let off methane gasses or leach into the water table. Asbestos waste also needs to be contained in a way that ensures there is no risk of asbestos fibres being released in the future.

General (organic) waste on the other hand, does decompose and consequently any landfill site that accepts this material, must have both methane extraction and leachate monitoring in place.

For the reasons outlined above, landfill sites cannot knowingly take organic material into a Stable Non-Reactive Asbestos Cell as it constitutes a breach of the Operator's licence.

Therefore asbestos waste mixed with high concentrations of organic material does present a challenge, as it doesn't have a clearly designated disposal route and there are very limited disposal options available for this type of material.

Who is the Environment Agency (EA)?



Environment
Agency

The Environment Agency is a regulatory body established to protect and improve the environment and more specifically for the purposes of this guide, the EA governs and regulates landfill sites in England.

Up until recently there has been no consistent stance from the EA on how asbestos contaminated organic material should be dealt with and has largely varied between individual Enforcement Officers.

Windsor Waste Management recognised some time ago that this lack of clarity was a cause of confusion and presented problems when it came to the disposal of this type of material. We have therefore been engaging with both the EA and our landfill site partners to establish an industry-wide best practice solution.

The EA has recently taken the stance, to be addressed on a case by case basis, that '**asbestos contaminated with a high concentration of organic material**', should be disposed of in a general waste landfill, rather than a Stable Non-Reactive Asbestos cell, as the main risk in disposing of this material is the methane and leachate generated by the organic material. They have also stipulated that the general waste landfill that accepts this type of waste, must be on a site which also has a hazardous waste landfill, as they have the necessary processes and procedures in place to deal with asbestos waste.

What do you do if you have a Problematic Waste Stream containing asbestos?

First and foremost, the Environment Agency need to be satisfied that you are not just taking the easy option and putting all the material into an asbestos container. Their expectation is that where possible, you must clean any general (organic) waste and this must be disposed of down the appropriate disposal route. Where this is not possible, you need to demonstrate why this cannot be done to justify that the waste needs to be treated as a problematic waste stream.

If you do have '**asbestos contaminated with a high concentration of organic material**', Windsor Waste Management can ensure that this is dealt with correctly and in line with EA procedures to avoid problems further down the disposal line such as rejection of a load, which can cause unnecessary additional costs and delays for you the customer. Through our engagement with the EA, we have established the necessary contacts and procedures to manage this waste appropriately and compliantly.

See overleaf for the process for dealing with this waste type»

The Process

Upon receiving your order for your Problematic Waste Stream, we will submit a Problematic Waste Stream application to the Environment Agency on your behalf.

Problematic Waste Stream Request Form
All questions must be answered in order for an assessment to be made. Please use additional sheets and provide additional evidence as required.

1. Is your waste a problematic waste stream (PWS) because of its total organic carbon (TOC) content? Yes / No*

2. Is your waste a one-off load? Yes / No*

3. Producer details: Name: _____ Address: _____

4. Your code: _____ Does this waste arise in Wales or Scotland? Yes / No*

5. Contact name: _____

6. EA contact (or if arising in Wales, NRW contact, or Scotland, SEPA contact): _____

7. Date of request: _____

8. Waste stream: _____

9. Load code: _____

10. Waste description (include physical characteristics): _____

11. Is the waste hazardous? Yes / No / Please tick (P) if 'Yes', what substance makes it hazardous? _____

12. Technical guidance WAC: <http://www.environment-agency.gov.uk/business/441709/7030804100172400000>

13. Actual storage produced (Q): (Both company specific and UK industry if known): _____

14. Quantity in one-off load (Q): _____

15. Current disposal method: (Include details of the destination landfill, disposal method and): _____

16. Please explain why the waste stream is problematic: _____

Note: hazardous wastes: • identify components and their concentrations (give range of values for each parameter) • compare with waste acceptance criteria (WAC) levels for granular, non-soluble, stable non-reactive hazardous waste, TOC and all risk assessment options • provide sampling methods used for assessment of WAC.

17. Consideration given to all alternative treatment or disposal options in the UK and EC (e.g. discharge to sewer, thermal treatment etc.): _____

* As per the List of Waste (England or Wales) Regulations 2005 800_11_S004, Version 2

Problematic Waste Stream Request Form
All questions must be answered in order for an assessment to be made. Please use additional sheets and provide additional evidence as required.

Note: If other options are available please provide details for not pursuing them. Please include copies of letters if advice etc. received from alternative treatment / recovery / disposal site operators to demonstrate that alternatives have been considered.

13. Review of technical work done to date: _____

Note: This should include consideration of process re-design (physical processes) and waste treatment / recovery options (chemical processes): _____

14. Alternative options being considered: _____

Note: These should include changes to processes as identified above and time-scale for achievement. Please identify short, medium and long term options if possible.

15. Proposed facility: Operator: _____ Permit number: _____ Site name: _____ Site address: _____

16. Any other comments / information: _____

17. Procedure / Approval of Environment Agency? Date: _____ Name & Signature (where appropriate): _____

Reviewed by producer area, or National Operations Technical Services (NOTS) team: _____

Sent to NOTS PWS Co-ordinator: _____

Reviewed by Data Landfill Regulation Group (LRD), PWS sub-group or confirmed by Chair as not required: _____

LRD PWS sub-group decision sent to producer area (NOTS): _____

Landfill confirmed to accept the waste and Local Area confirms no impact: _____

Waste confirmed / rejected* as PWS: _____

Enforcement Position approval obtained from Head of Site Based Regulation / NOTS Technical Manager: _____

Letter to producer confirming waste may be disposed of to the specified landfill: _____

* - delete as applicable

* See Q1 on the regulation of higher landfill waste acceptance criteria for hazardous waste (201_01, version 1, July 2008) 800_11_S004, Version 2

To assist with this, we will need the following:

- **Images of the waste**
- **Asbestos report**
- **Written justification as to why it is not practicable to remove the general (organic) content**

Once the application has been submitted, our expectation is that it will take 5-10 working days to receive a response from the EA.

Once acceptance is received from the Environment Agency, the waste can be removed from site.

Despite the waste being destined for general landfill disposal, it is still classified as hazardous and you will still receive the completed consignment note and all other relevant documentation

Why is the cost to dispose of problematic waste more expensive than asbestos waste?

There are limited disposal points or landfill sites across the UK that accept such waste. As outlined above, the sites that do accept this material have been engineered to both; deal with the leachate and methane from the organic material and contain hazardous waste such as asbestos. They will go to great lengths to contain the waste, for example by using clay and other materials to isolate the material and minimise the risk of the waste leaching or escaping into the surrounding environment.

The above reason, coupled with the additional cost for transport, such as fuel and driver time, will often result in problematic waste being more expensive to dispose of than just asbestos waste alone.

You can rely on Windsor Waste Management

It is important that '**asbestos contaminated with high concentration organic material**' is dealt with in compliance with the procedures outlined in this document, to avoid any potential risk to the environment, as well as any penalties or additional costs that can result from a rejected load.

With our knowledge and expertise in dealing with hazardous and problematic waste streams, Windsor Waste Management can support you through the process so you can rest assured your waste is being handled efficiently and compliantly in line with current regulations and guidance from the EA.



If you need further advice, information or assistance in this area, please call us on 01708 55 99 66 and a member of our professional and knowledgeable team will be happy to assist.

Contact & Information

Contact a member of our team today for advice on managing your waste!

Call: **01708 55 99 66**

Email: **enquiries@winwaste.com**

About Windsor Waste Management

Windsor Waste Management is a market leader in the hazardous waste management industry and significant providers of wider waste management services. We have a wealth of experience and an unrivalled reputation in providing environmentally responsible and fully compliant waste management solutions to the asbestos removal, construction and demolition industries.

A fully licensed and highly accredited recycling and waste management company, our certifications include international standards for environmental management ISO 14001, quality management ISO 9001 and health & safety OHSAS 18001.



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