



WASTE CONTAINERS: A GUIDE TO DISPOSAL

Paul Franklin, technical secretary for the Liquid Roofing and Waterproofing Association (LRWA) explains the waste packaging rules and how to classify containers after use.

Waste management is a topic often raised by contractors. Many are unsure of how to correctly dispose of packaging after using liquid waterproofing products and other ancillaries such as adhesives and primers. One of the main areas of confusion is classification.

All waste must be classified in accordance with the Environmental Agency's Technical Guidance (WM3). However, before doing so, contractors must identify if the waste has hazardous properties.

Product Labelling

The classification and labelling of substances and mixtures in the EU is governed by CLP regulation.

This requires companies to appropriately classify, label and package their substances and mixtures before placing them on the market. It aims to protect workers, consumers and the environment with labelling that reflects a chemical's possible hazards.

The product label of a hazardous substance or mixture includes pictograms, signal words, hazard statements and precautionary statements. This information can also be found on the material safety data sheet (MSDS).

Since June 2015, pictograms with a red diamond on a white background have replaced the orange squares from the old system.

These symbols can be found on the packaging of many products, including those used in construction, the workplace, and the home such as household cleaners and paint.

Industry Guidance on Waste Packaging

The 'Industry Assessment and Classification of Packaging Waste (WP1) Technical Guidance' complements WM3 and focuses on waste packaging, including containers ranging from bags, bottles and tins, through to kegs, barrels and drums.

The document includes a flowchart to help companies assess whether packaging to be taken off site actually constitutes as waste, and whether it should be classified as hazardous or not.

Section two includes definitions for 'returnable re-usable packaging' (which is not classed as waste), and 'effectively empty' packaging, which has been treated to remove any left-over contents. Normal industrial standards or processes for treating packaging that is not sealed may involve washing, pouring, draining or scraping.

How to Classify Empty Containers

Containers which have been emptied, but not washed out in line with the specific methods and calculations prescribed in WP1 and WM3, should be classified as packaging containing residues of/or contaminated by hazardous substances using waste code 15-01-10.

Containers with hazardous residues that have been emptied and washed-out in line with the method and calculations which are detailed in the industry guidance can be classified as non-hazardous waste packaging.

However, there is often a misunderstanding that packaging can simply be classified as non-hazardous if it has been emptied and contains a residue of less than two per cent of the overall weight of the container. In reality, the classification process is more involved than that and requires various forms of calculations and records to prove it is non-hazardous.

Furthermore, to comply with this method, the contractor must be able to identify all of the hazardous properties within the product together with the concentrations

present. They must also keep records from the calculations to prove it is non-hazardous for a minimum of two years.

Unless a contractor can confidently carry out the calculations, then our advice would be to classify packaging as containing residues of/or contaminated by hazardous substances using waste code 15-01-10.

Duty of Care

Contractors are legally obliged to correctly classify waste and ensure it is stored and handled safely and securely. Environment Agency Inspectors or waste handlers may ask for evidence of such.

Companies also have a duty of care towards the health and safety of those further along the waste chain.

For further information, the full version of the 'Industry Assessment and Classification of Packaging Waste (WP1) Technical Guidance' note can be downloaded from the LRWA website.

If you require more technical advice regarding the classification and disposal of containers, there are also specialist waste consultants who can assist.

For more information or advice, please contact us at technical@lrwa.org.uk