University of Glasgow

Safety & Environmental Protection Services Guidance Note

Identifying Special Waste

Introduction and Background

'Special waste' is the name given in Scotland to hazardous waste. The Special Waste Amendment (Scotland) Regulations 2004 updated The Special Waste Regulations 1996. They take account of current European legislation and adopt a definition of special waste in line with this.

Defining Special Waste

Special Waste is any waste that is hazardous waste as defined by Article 1(4) of the Hazardous Waste Directive. This includes substances or categories of waste that are marked with an asterisk in the European Waste Catalogue. The European Waste Catalogue can be accessed at http://www.environment-agency.gov.uk/static/documents/GEHO1105BJVS-e-e.pdf.

Wastes that are marked with an asterisk in the European Waste Catalogue are further subdivided into categories that are either 'Absolute Entries' or 'Mirror Entries'.

'Absolute Entries' are highlighted in red and with the symbol 'A'. These wastes are always special waste.

'Mirror Entries' are highlighted in blue and show the symbol 'M'. These wastes are only special waste if the dangerous substance or substances are present above a threshold concentration.

Diagram 1 summarises the process for determining if waste is Special Waste.

Considering 'Mirror Entries'

Wastes that appear in the European Waste Catalogue as a 'Mirror Entry' are only special waste if the dangerous substance or substances within them are present above a threshold concentration.
You should follow these steps when determining if a 'Mirror Entry' waste is special waste:

1. Determine the composition of the waste
2. Identify the risk phrases that apply to each component of the waste (these can be obtained from sources such as the safety data sheets that are provided by the supplier)
3. Use these risk phrases, in conjunction with the separate appendix, to determine which hazardous properties apply to the waste.
4. Having determined the hazard(s) use the appendix to identify the threshold concentration that applies to each component of the waste.
5. Check if the concentrations of any dangerous substances within your waste exceed any of the thresholds given in the appendix.

6. Remember that if a waste contains more than one component you will need to consider whether the sum of these exceeds the threshold concentration for that hazard. The separate appendix shows which risk phrases this applies to.
7. If any of the threshold concentrations are exceeded then the waste must be classified as special waste.

An example can be viewed at the end of this document and the process of identifying special waste is summarised in Diagram 1.

Examples of Special Waste

The majority of waste produced by University departments is non-hazardous. However, waste that is hazardous, and therefore special waste is produced by a number of departments, for example:

- Some substances that are used in cleaning, building maintenance and grounds activities.
- Some substances that are surplus to laboratory requirements.
- Some substances that are produced by experimental work.
- Waste that may be infectious.
- Fluorescent tubes
- Lead, Ni-Cd and mercury containing batteries.
- Computer monitors.
- Televisions and equipment containing cathode ray tubes.
- Equipment containing ozone-depleting substances such as CFC gases or insulation that is formed from CFC blown foam (including certain fridges and freezers).

Storing and Disposing Special Waste

Information on the correct storage and disposal of Special Waste is provided in the University Guidance Note 'Duty of Care in Waste Storage and Disposal' that is available on SEPS website where you will also find a form that can be used to obtain a quotation for the disposal of your special waste.

Further Information

The appendix to this Note shows hazard codes, risk phrases and thresholds. It is available as a separate document on the SEPS web site.

Please note, this is an interpretation and summary of the relevant legislation. If you are in doubt about the classification of waste then it should be consigned as special waste. Alternatively contact SEPS for assistance with a more detailed assessment of the waste.
The joint Scottish Environmental Protection Agency (SEPA) / Environment Agency document Hazardous Waste: Interpretation of the definition and classification of hazardous waste (Second Edition) (WM2) http://www.environment-agency.gov.uk/business/topics/waste/32200.aspx and the SEPA document Special Waste Amendment (Scotland) Regulations 2004 Frequently Asked Questions also provide additional information
http://www.sepa.org.uk/waste/waste_regulation/special_waste/frequently_asked_questions.aspx?theme=textonly

*Example: Considering '**Mirror Entries**' within the European Waste Catalogue (EWC).*

Example:
A quantity of a 25% aqueous solution sulphuric acid waste produced by a laboratory that undertakes research into animal disease.

Step A. Check the EWC and determine how the waste type is categorised within it.

Within the EWC there is an entry for:

18 02 ‘wastes from research, diagnosis, treatment or prevention of disease’
One subparagraph of this entry is:

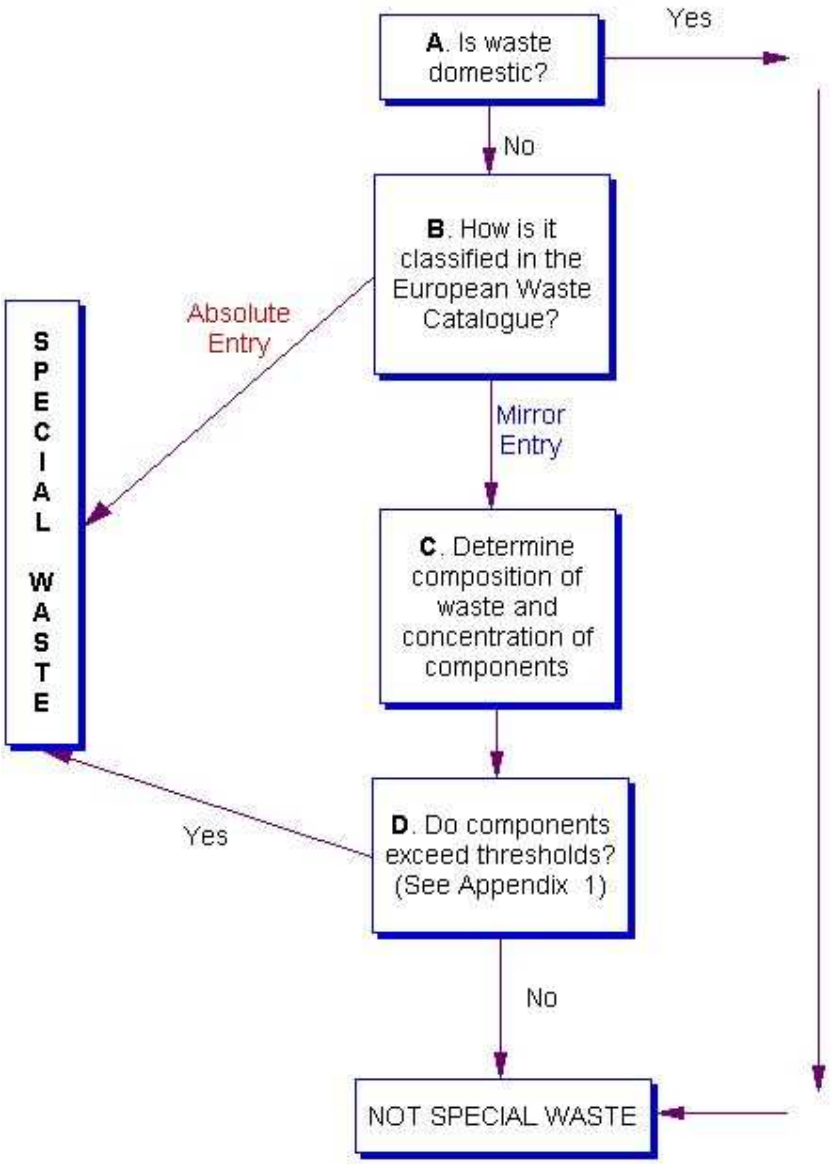
‘18 02 05 chemicals consisting of or containing dangerous substances’

As this subparagraph is in *blue* and shows the symbol *M* we know that the sulphuric acid solution may be special waste if it exceeds the relevant threshold.

Step B. Consider the following steps shown in the Guidance Note to see if the waste is special waste:

1. Determine the composition of the waste – *the waste is 25% aqueous solution of sulphuric acid.*
2. Identify the Risk Phrases that apply to each component of the waste (these can be obtained from sources such as the Safety Data Sheets that are provided by the supplier) - *the safety data sheet shows that the risk phrase that applies to sulphuric acid is R35*
3. Use these Risk Phrases, in conjunction with Appendix 1 to determine which hazardous properties apply to the waste - *the entry in Appendix 1 shows that the hazardous property of a waste with a risk phrase of R35 is corrosive and the hazard code is H8*
4. Having determined the hazard(s) use Appendix 1 to identify the threshold concentration that applies to each component of the waste - *Appendix 1 also shows that the threshold concentration for waste that has this classification is 1%*
5. Check if the concentrations of any dangerous substances within your waste exceed any of the thresholds given in Appendix 1 – *the concentration of sulphuric acid in the solution is 25% and so exceeds the 1% threshold.*
6. Remember that if a waste contains more than one component you will need to consider whether the sum of these exceeds the threshold concentration for that hazard. Appendix 1 shows which Risk Phrases this applies to - *there are no other risk phrases that apply to this waste.*
7. If any of the threshold concentrations are exceeded then the waste must be classified as Special Waste – as the example waste exceeds the threshold for it’s risk phrase it must be consigned as special waste

Diagram 1 - Identifying Special Waste



NB - Although radioactive waste does not fall within the definitions of waste considered in this Health & Safety Note it may be hazardous, depending on its properties. If the propreties and concentrations present may constitute a hazard to health or to the environment, either during or after disposal, you should disclose this to Radiation Protection Service prior to disposal.