

20/05/2014
Re: Waste Classification

Dear Licensee,

EPA licences require that licensees shall ensure that waste is classified, packaged and labelled in accordance with National, European and any other standards which are in force in relation to such labelling. The EU Waste Framework Directive, transposed in Ireland by the European Communities (Waste Directive) Regulations 2011, S.I. 126 of 2011, provides the legislative framework for the classification of waste in accordance with the Commission Decision 2000/532/EC¹ list of waste. Correct waste classification is the foundation for ensuring that the collection and transportation of waste, as well as its storage and treatment, are carried out in a manner that provides protection for the environment and human health and in compliance with legal requirements.

The contamination of Dutch pig feed in 2002 and the more recent PCB contamination of pork products in Ireland in 2008, provide examples to illustrate how inappropriate waste management can have significant consequences. This highlights the importance of waste classification and use of the correct EWC code in accordance with the list of waste established by Commission Decision 2000/532/EC.

The EPA previously developed a paper tool in 2002^[2] (updated in 2012) for the identification of the hazardous components of waste. The paper tool consists of a worksheet, forms and instructions that follow a series of steps, allowing Licensees of waste to identify and classify it in accordance with legislation. On completion of the classification, the correct EWC code is assigned from the list of waste. The classification process is complex and based on legislation which is constantly evolving. The EPA frequently receives inadequate submissions resulting in licensees having to revise their original submissions to demonstrate that the waste has been classified correctly and the correct EWC code applied.

To address the issue of changing legislation and to streamline the classification process, the EPA will now accept submissions via the web-based tool www.hazwasteonline.com. This tool provides an auditable tool for the classification of potentially hazardous and hazardous waste materials such as contaminated soils, filter cakes, sludge residues and wastes from organic processes etc. The EPA has purchased a licence to use the web-based package.

¹ COMMISSION DECISION of 3 May 2000 replacing Decision 94/3/EC establishing a list of wastes pursuant to Article 1(a) of Council Directive 75/442/EEC on waste and Council decision 94/904/EC establishing a list of hazardous waste pursuant to Article 1(4) of Council Directive 91/689/EEC on hazardous waste

^[2] Available for download at <http://www.epa.ie/waste/hazardous/class>

The EPA will now accept hazardous waste classification submissions from licensees using either the paper based tool or waste classifications done via the www.hazwasteonline.com web based tool. The submissions, whether using the paper based or web based tool, must be completed in full and correctly and accompanied with the attached template which in turn will provide the EPA with better quality submissions and provide a faster turnaround time in the EPA's assessment of the submissions.

Submissions using the paper tool must be made via the licensee returns function on the ALDER/EDEN web-based reporting system. In the case of the submissions via the web based tool, the report can either be printed off and the submission made via the licensee returns function or it can be submitted via the web based portal where an email notification will be issued to the OEE inspector. Where you choose to use the web based tool to submit the classification, you must in parallel update the ALDER/EDEN web-based reporting system for a new licensee return.

If you have any queries please contact the undersigned or

Damien Masterson (d.masterson@epa.ie) for the Wexford Regional Inspectorate

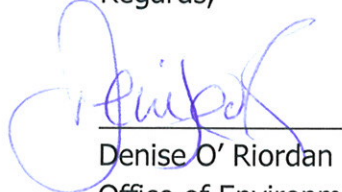
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Regards,



Denise O' Riordan

Office of Environmental Enforcement.