



Hazardous Waste

Standard Operating Procedure (SOP)

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1 Purpose

This SOP is to explain how hazardous waste should be managed at the university in order to:

- address the risks associated with hazardous waste
- ensure that hazardous waste documentation is stored and maintained
- ensure that hazardous waste is handled and stored appropriately
- ensure compliance with relevant environmental legislation.

The University of Nottingham will, so far as is reasonably practicable, manage all hazardous waste activities falling under its control in a manner so as to minimise the harm to human health and the environment.

2 Scope

This policy applies to all hazardous wastes generated by the university as part of university business. It includes both solid and liquid hazardous waste. Where necessary and for specific topics, this SOP will be supported by guidance documents detailing the procedural requirements for the classification, identification and management of hazardous waste at the local level, as well as any expectations around training and competence.

Exclusions: The management of radioactive waste, non-hazardous waste and emissions to air from ventilation stacks are excluded from this SOP. Radioactive wastes are covered by the general duties within this SOP, however specific requirements are laid down in the [Ionising Radiation Policy and Guidance](#).

3 Roles and Responsibilities

The University Health and Safety Committee will:

- Be responsible for overseeing the effective implementation of the Universities hazardous waste practices and monitoring compliance via the Estate Office
- Consider and approve the annual review from Estate & Facilities in relation to Hazardous waste.

The University's Estate & Facilities Department will:

- Provide and keep updated, standard operating procedures, arrangements and guidance to ensure any statutory requirements for hazardous waste are met



- Ensure sufficient allocation of appropriate external storage facilities for hazardous wastes awaiting collection
- Ensure producers of hazardous waste are kept updated on any changes in legislation or procedure
- Provide competent advice and support on hazardous waste to the University where appropriate
- Appoint a Dangerous Goods Safety Advisor (DGSA) to provide advice, training and reporting on hazardous waste
- Provide periodic training for Hazardous Waste Coordinators (HWCs) on hazardous waste where appropriate
- Ensure that Business Units adhere to the university guidance by carrying out routine monitoring, inspections and audits
- Carry out annual duty of care visits of the University's approved waste contractors
- Carry out inspections and report these to the Safety and Sustainability committees via an annual report
- In conjunction with the procurement department, put in place suitable contracts and arrangements for the appointment and management of university approved hazardous waste contractors.

The Safety Office will:

- Be responsible for providing expert advice on H&S related matters
- Periodically conduct H&S inspections and audits and are responsible for ensuring that any findings are reported back to the Estate & Facilities Leadership Team.

Head of Business Units (e.g. department or school) will:

- Ensure that they have suitable systems in place for the assessment of risk relating to hazardous waste
- Ensure that local management of hazardous waste meets the requirements as set out in university SOPs and associated arrangements / guidance
- Ensure that a local HWC is appointed where hazardous waste is produced
- Ensure that the local HWC has sufficient training, experience or knowledge and time and resources to enable them to assist in undertaking the measures required to meet all of the statutory provisions
- Ensure that adequate resources are allocated to the management of hazardous waste
- Lead by example e.g. accompany direct reports on health and safety inspections
- Ensure that training records are kept up to date



- Ensure any significant accident, incident or enforcement action is appropriately investigated

Hazardous Waste Co-ordinators will:

- Monitor local management of hazardous waste to meet the requirements as set out in university SOPs and associated arrangements
- Maintain their competence by attending internal training courses
- Maintain an inventory of hazardous waste for the business unit
- Report significant failings relating to the management of hazardous waste to senior managers
- Take part in the investigation of any significant accident, incident or enforcement action related to hazardous waste
- Take part in Estate & Facilities audits when required

All Staff and Students will:

- Comply with all policies, arrangements and guidance both at a university and local level
- Take steps to eliminate or reduce the amount of hazardous waste being generated by their procedures, where reasonably practicable
- Report any shortcomings or defects in the current control measures used when working with hazardous waste external expert advice on packaging and transport (provision of competent advice).

The DSGA will be responsible for:

- Provision of timely expert competent advice in relation to the packaging and transport of hazardous wastes, as defined in this SOP
- The production of an annual report, to the Senior Environment Officer or representative, on matters and any possible issues associated with the management of hazardous wastes on site.

4. Procedural Steps

The University has a Duty of Care requirement under Section 34 of the Environmental Protection Act 1990 to store, transport and dispose of waste responsibly, and there are legal requirements that must be met for general waste, recycling and hazardous waste.



Key steps

Staff dealing with hazardous waste have a legal obligation to:

1. Classify waste to check if it's hazardous. Waste is generally considered hazardous if it (or the material or substances it contains) are harmful to humans or the environment. Examples of hazardous waste include:

- chemicals, such as brake fluid or print toner
- solvents
- pesticides
- oils (except edible ones), such as car oil
- equipment containing ozone depleting substances, e.g. fridges
- hazardous waste containers

The following wastes are dealt with via Estates & Facilities:

- asbestos
- WEEE (waste electrical and electronic equipment), excluding computer equipment
- Portable batteries (over 45kg)
- Fluorescent tubes and lamps
- Fridges and freezers

Requests for collection of these kinds of wastes can be submitted via the Estates Helpdesk [here](#). Steps 2 and 3 must still be followed until the waste is collected by Estates staff.

Full guidance on how to classify the type of waste being generated can be found in the [Guidance on the classification and assessment of waste Technical Guidance WM3](#). This guidance also includes the relevant thresholds for determining whether a waste is hazardous or not.

2. Separate and store hazardous waste safely and securely. Hazardous waste must not be mixed with any other wastes, whether hazardous or non-hazardous. To do this:

- store waste in a secure place
- use suitable containers that will stop waste escaping
- label containers clearly with the type of waste they contain
- use covers to stop waste blowing away
- use waterproof covers if rain could cause contaminated run-off or prevent the waste from being reused

Store different types of waste separately, so that:



<ul style="list-style-type: none">• they do not contaminate each other• they can be reused more easily• you can complete the waste transfer note correctly.
<p>3. To ensure the safety of staff, students and visitors who may generate or handle any wastes generated. PPE and safety equipment should be provided where necessary.</p>
<p>4. Use authorised businesses to collect, recycle, treat or dispose of its hazardous waste. Please see Appendix A for a list of pre-approved hazardous waste contractors. Any contractor engaged to remove waste from university premises must be registered with the Environment Agency as a Registered Waste Carrier. The Environment Agency Public Register should be checked to obtain the registration number and expiry date. The University is registered as a Lower Tier Waste Carrier (registration number CBDL475), which allows university waste, excluding construction or demolition waste, to be legally transported by university vehicles to an appropriate disposal or holding facility. Access the public register for environmental information.</p>
<p>5. Complete the relevant parts of the Consignment Note that applies to the University – keeping one copy and giving two copies to the carrier collecting the waste. These notes act as a legal record of the waste consignment. Guidance on consignment notes can be found below.</p>
<p>6. Keep accessible records for three years at the premises where the waste was produced or stored – these may be inspected at any time by the Environment Agency.</p>

Consigning waste

Where hazardous waste is being produced, holders of hazardous waste are subject a system of consignment notes as part of their Duty of Care. Consignment notes fulfil the Duty of Care requirement for a written description to accompany the transfer of waste.

Consequently, a consignment note is the only document that needs to be completed when hazardous waste is collected for disposal. Where you are consigning the waste, you must ensure that the waste has been consigned correctly.

For guidance on filling our consignment notes, see [here](#).

Some waste operators use electronic versions of a paper consignment notes. Electronic notes will still need to be completed and signed in the same way as a paper note. An email address will likely need to be provided so that the completed form can be sent to the relevant person as a record of the waste consignment.



Fluorescent tubes

- Estates & Facilities are responsible for transferring waste fluorescent tubes to designated locker boxes.
- The lockers are collected and replaced by the waste contractor on request by the relevant Campus Services Manager or Facilities Services Manager.
- Please contact the [Estates Helpdesk](#) to arrange for a collection of waste fluorescent tubes.

WEEE waste

- In the first instance, staff are encouraged to return old electrical and electronic equipment free of charge by using suppliers' or manufacturers' take-back schemes.
- All departments that generate WEEE waste which cannot be returned to suppliers are to contact the [Estates Helpdesk](#) to arrange for its collection, providing details of the wastes' location, type and quantity. The Transport & Logistics Team will then collect the waste and transfer it to the WEEE waste skip located on Kings Meadow Campus.

Batteries

- Battery bins are located in various locations around campus and are collected on request by a relevant waste contractor. Please contact the [Estates Helpdesk](#) to arrange for a collection.

Monitoring and Assurance

In line with the roles and responsibilities above, local inspection and monitoring activities will be carried out at a local level. The Senior Environment Officer is responsible for ensuring that an annual audit is completed, including of physical security of waste compounds and for duty of care audits. In addition, the externally appointed DGSA will provide an independent report. Reports will be taken to the H&S Committee for governance and oversight purposes.

5. Internal, Statutory or Regulatory Requirements (where applicable)

The SOP has been developed with the context of:

- The Hazardous Waste (England and Wales) Regulations 2005, as amended.
- Controlled Waste (England and Wales) Regulations 2012, as amended.
- The Environmental Protection Act 1990, as amended.
- The Management of Health & Safety at Work Regulations.
- The Health & Safety at Work Act 1974.
- Control of Substances Hazardous to Health Regulations 2002, as amended.



- The Waste Electrical & Electronic Equipment Regulations 2013, as amended.
- The Environmental Permitting (England & Wales) Regulations 2016.
- The Waste (England and Wales) Regulations 2011, as amended.
- Carriage of Dangerous Good Regulations (ADR)

6. Associated Documents, Appendices and Resources

Local advice

Local HWCs are available to provide general advice and support in relation to wastes and to signpost to university information.

Additional information about hazardous waste can be found on the university sustainability webpages [here](#).

Expert advice

Biosafety advice can be sought from the Safety Office: h&s@nottingham.ac.uk

Please also refer to the university's [Biological Safety Policy](#). Biological waste guidance and template documents can be found here: [Biological Waste Guidance](#).

For hazardous clinical waste, you can find further information and resources, including posters and signage, on the Stericycle website here: <https://www.stericycle.co.uk/en-gb/resource-centre>

Expert advice on classification, assignment, packaging and transport of hazardous waste can be obtained from the DGSA for hazardous waste. Please contact the Sustainability team within the estate office sustainability@nottingham.ac.uk if you would like to get in contact with them.

Further support and advice can be sought from the Sustainability Team within Estate & Facilities: sustainability@nottingham.ac.uk



Appendix A - University of Nottingham Approved Waste Contractors – Hazardous Waste

Waste Contractor	Types of waste taken	Carrier License Number	Contact	Agresso supplier number
Enva England Ltd	Hazardous waste	CBDU84916	emu@enva.com 0115 940 7042	80267
Ward Recycling	Hazardous waste	CBDU532900	https://www.ward.com/contact-us/ 0345 337 0000	141115
Stericycle	Pharmaceutical, Chemical & Hazardous wastes Clinical waste	CBDU105283	https://www.stericycle.co.uk/en-gb/contact-us 0333 240 4400	76366
Tradebe (Labwaste Ltd)	Waste chemicals Industrial waste Waste oil	CBDU429883	info@tradebe.com	137962
WasteCare (Battery Back)	Waste batteries	CBDU84992	recycling@wastecare.co.uk 0800 091 0000	106006
Grundon	Radioactive waste	CBDU147323	https://www.grundon.com/contact/ 01491834311	149362