

THE END IS NIGH

Time is ticking on the independent sector's role as the chief collector of hazardous waste

Independent hazardous waste transfer businesses have traditionally been at the front line when it comes to hazardous and difficult waste collection (otherwise known as traditional drum waste) in the UK. While the debate has been loud and contentious over the impact of legislative changes in recent years, little regard has been given to the impact upon this specific sector.

Historically, drum transfer in the UK has been a low technology operation – minimum characterisation of waste and minimum verification upon arrival on site. Under the Waste Licensing system sites have operated – very successfully – by only achieving these minimum standards. This has undoubtedly contributed to their success against the larger waste companies, where such a low specification approach does not fit the corporate profile.

So, will the Hazardous Waste Regulations finally bring this minimum standard mindset to a timely end? With its more stringent demand for waste characterisation and coding it will unquestionably have a major impact upon the waste transfer sector, while proving a substantial challenge in terms of the increased administrative burden. However, its impact upon the waste transfer station's shop floor operation will be minimal.

The real driver behind changes in the waste transfer sector is Integrated Pollution Prevention and Control (IPPC) and its phased imposition over the next three years. Most of the independent transfer stations must have started the process of achieving the full IPPC standard, for which the absolute deadline is three years hence.

IPPC is the natural concomitant to the Hazardous Waste Regulations in that it imposes operating principles that effectively measure the efficacy

of the consignment process. IPPC requires examination and testing of all containers; it dictates the need for compositional detail in advance and calls for technical verification upon arrival. Significantly, this attention to detail follows the container through the transfer station and onward to ultimate disposal.

This whole process therefore constitutes a significant raising of the technical bar and brings with it a massively enhanced logistical burden. From now on, sites will have to invest in proper laboratories and a much larger technical management team. If you add that to the slower processing that inevitably goes hand-in-hand with the greater attention to detail, you can see why at BCB it is believed it will take three people (one of which is technically qualified) to do the work of one man under the former waste management licence.

But it doesn't stop there with IPPC. Emissions to the environment in general, and to air in particular, are at its very heart, with air being an aspect not previously addressed by former waste management licensing regulation.

Emitting processes can be defined as the traditional practices of drum crushing, container shredding and, to a lesser extent, skip filling. In order to meet the new standard these operations have to be contained, the emissions captured, measured and either abated or, notwithstanding the application of BAT (best available technology) subject to an elevated subsistence charge. Assuming the practical design of the site lends itself to an engineering approach, which many of the traditional sites do not, this comes with a very hefty price tag that may not be affordable to many of the independent companies.

To put these arguments into

perspective, consider that BCB had the opportunity to design a state-of-the-art hazardous waste transfer station from the ground up, with the intention of meeting, if not surpassing, the incoming new legislation. As a starting point it had a 2700 m² enclosed building (a former aircraft hangar) to play with. It constructed the "green room" as a negative pressure zone to contain and abate emissions to air, fully bunded the floor to protect against potential spillages and erected a viewing gallery to make operations highly visible. Add to this considered engineering approach the construction of a modern laboratory and the commissioning of bespoke database software and you have a facility that can actually just about achieve both IPPC and the Hazardous Waste Regulations. However, this will have represented a total investment of £750 000 when the final piece of the engineering puzzle is put into place this month.

I do not believe that the independent sector at large can afford full IPPC implementation. I do believe, however, that the clock is ticking on its position as the chief collector and transferor of hazardous waste in the UK. BCB had the good fortune to start the process early, when costs were lower, and has also had the benefit of being the largest independent operator by some margin. It has already identified a trend where other waste management facilities are becoming its clients, both independents and large nationals. BCB expects this trend to continue as its competitors decide to scale down IPPC and settle for partial compliance, thereby restricting their operational capabilities.

So what is the future for the waste transfer industry? In a nutshell, less choice, higher costs. The real worry is that the cost of entry is now too high for independent start-ups and that the independent sector will dwindle away gradually over the next few years. Whether or not this is a good thing for waste management practice in the UK remains to be seen. ■



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HAZARDOUS WASTE

