

Advisory Note

Hazardous waste – Management of waste generated at timber treatment plants

October 2018



South African Wood Preservers Association

Background

This advisory note aims to assist treatment plant owners, management and staff in managing and disposing of contaminated hazardous waste generated at your treatment plant, and to inform and create awareness to the obligations in complying with the NEMA - Waste Act (Act No. 59 of 2008), and the associated Regulations and Norms & Standards. This advisory note does not proclaim to contain all the detail, information or instructions included in the legislation. For this, treaters must refer to the applicable regulations and norms and standards, or consult with your chemical preservative supplier, or consult with an expert consultant on waste management.

Purpose of Waste Management - To prevent, and minimize the generation of hazardous waste in order to prevent any contamination or pollution of the environment. Minimizing your hazardous waste will also reduce the costs associated with the disposal.

Hazardous Waste at a treatment plant – Any material, other than timber, that comes into contact with a wood preservative solution or concentrate is regarded as hazardous, e.g. CCA. This includes contaminated personal protection equipment (PPE), sweepings collected from the bund and drip pad areas, sludge formed in the vessel or tanks, e.g. contaminated soil, sawdust, etc., and any other foreign materials e.g. strapping, string, etc.

Proactive controls and measures by management will enable prevention and reduction of waste and reuse of chemical. Where relevant, such measures should include the following:

- Ensure timber destined for treatment is free of loose soil, mud, loose bark, sawdust etc.
- In the case of waterborne preservatives, rinse plant waste using a rinsing filter so as to recover as much of the chemical as possible for re-use.
- Allow wet waste to dry out, thus reducing volume and mass of the waste.
- React promptly and correctly to any chemical spills and don't use excessive absorbent material.
- Contain and recover chemical drippings and spills for re-use.
- Minimize the flow of rainwater that may carry soil etc. into the plant area by proper design and construction.
- Contaminated rainwater must be contained, recovered and re-used as process water.
- Implement directives that prohibit eating, drinking and smoking in the treatment plant area.
- Segregate waste streams, i.e. sludge, PPE, strapping, etc.
- Securely retain all empty chemical containers and return to chemical suppliers, or dispose of in accordance with the chemical supplier's label instructions.

Regulations, norms and standards

Waste Classification and Management Regulations: GoN R.634, 23 August 2013

The purpose is to regulate the classification and management of waste, general duties of generators, transporters and managers of waste, prescribe requirements for the disposal of waste, timeframes etc.

What does the Waste Classification and Management Regulations say?

- Waste generator is any person whose action, production processes or activities result in generation of waste.
- Waste must be classified in accordance with SANS 10234 within 180 days of generation.
- Generators of hazardous waste must ensure that:
 - o waste is stored in suitable and sealable containers,
 - o waste is kept separate for the purpose of classification, and not be mixed prior to classification,
 - o a Safety Data Sheet for hazardous waste is prepared in accordance with SANS 10234,
 - o waste must be labeled, or records kept indicating the date in which waste was first placed in container, and the date when waste was last placed in the container and filled, closed and sealed, classification of waste, etc.,
 - o **Note:** *Waste cannot be accepted by waste transporters and waste managers if it has not been classified.*
 - o waste is disposed of within 18 months of generation,
 - o waste is assessed and disposed of in accordance with the Norms and Standards for Assessment of Waste for Landfill Disposal, and
 - o a waste manifest document, containing information as requested, is completed for each consignment of waste transported to a waste manager.

National Waste Information Regulations: GoN R.625, 13 August 2012

The purpose is to regulate the collection of data and information to fulfill the objectives of the National Waste Information System as set out in the Act.

What does the Waste Information Regulations say?

- Any waste generator (plant) that generates waste in excess of 20kg per day must be registered (<http://cr.environment.gov.za/>) as a waste generator on the South African Waste Information System (SAWIS).
 - o **Note:** *The above requirement is not stipulated in the Regulation for those that generate less than the 20 kg/day. However, it would seem that the registered hazardous waste disposal companies still require that these generators must register on the system as a non-reporting generator.*
- Hazardous waste generators must report their actual waste generated on SAWIS on a quarterly basis.
- Each site (point of generation) must register individually.

What happens after registration on SAWIS is completed ?

- Once registered your site will be issued with a Generators Waste Information Record (WIR).
- The WIR must be indicated on the SAWIS Waste Profile Sheet.
- An account must be opened with the nearest hazardous waste management site in order for your waste to be disposed of.
- A copy of the Waste Profile Sheet must accompany every application for disposal.
- A waste sample must be submitted to classify (determine toxicity profile) your waste.
- The WIR certificate and latest Safety Data Sheet must also be submitted.

The National Department of Environmental Affairs has developed a South African Waste Information Centre (<http://sawic.environment.gov.za/>) that provides the public, business, industry and Government with access to information and management of waste in South Africa. The Department has also developed a Hazardous Waste Fact Sheet that contains information on what hazardous waste is and also what the regulations, norms and standards are, which is relevant to hazardous waste.

(See <http://sawic.environment.gov.za/documents/4947.pdf>)