

# Hazardous waste disposal procedure

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Owner: **Assistant Director, Procurement and Commercial**  
Responsible work team: **Sustainable Development**

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## 1 Scope

- 1.1 The purpose of this policy is to provide guidance for the appropriate storage and removal of hazardous waste from all Brigade premises.
- 1.2 This policy applies to all Brigade personnel who create or are involved in the disposal of hazardous waste. Failure to follow this policy may result in fines for non-compliance and polluting the environment.
- 1.3 For disposal procedures related to non-hazardous waste, refer to Policy number 862 - waste management.

## 2 Definitions

<b>Clinical waste</b>	Hazardous to humans, and consists wholly or partly of: human or animal tissue; blood or other body fluids; excretions; drugs or other pharmaceutical products; swabs or dressings; or syringes, needles or other sharp instruments.
<b>Carrier</b>	The person who collects and transports waste to another location.
<b>Consignee</b>	The person to whom the waste is being transported for disposal.
<b>Consignor</b>	The person who causes the waste to be removed from the site where it is being held.
<b>Consignment note</b>	A form used to record any hazardous waste being taken off site. It must be completed by the consignor, carrier and consignee, and retained for 3 years at the site and electronically.
<b>Contamination of waste</b>	Any unwanted material that is placed in the wrong waste stream and doesn't allow the waste collection to take place.
<b>COSHH assessments</b>	Risk assessments, based on the Material Safety Data Sheet (MSDS), carried out to assist with the provision, use, storage and an emergency when handling the substances.
<b>GHS</b>	Globally Harmonized System (Classification and Labelling of Chemicals).
<b>Hazardous waste</b>	Waste containing substances or has properties that could be harmful to human health or the environment.
<b>OSC</b>	Operations Support Centre
<b>Person in control (PIC)</b>	The person in control as defined in Policy number 490 – Person in control of LFB premises.
<b>PPE</b>	Personal protective equipment.
<b>WEEE</b>	Waste Electrical and Electronic Equipment. End of life products that have a plug or need a battery (e.g. most computer monitors and televisions, fridges and fluorescent lighting) is classified as hazardous waste.

### 3 Introduction

- 3.1 London Fire Brigade has a responsibility to ensure that all hazardous waste streams are disposed of responsibly, using the appropriate schemes in place.
- 3.2 It is a legal requirement for all who produce, keep or dispose of waste of any type to comply with the various regulations and the Duty of Care under environmental protection legislation.

### 4 Disposal procedure

- 4.1 Hazardous waste is not to be disposed of in the general, recycling, food waste bins or skips.
- 4.2 LFB staff that produce hazardous waste must ensure that they segregate and store hazardous waste separately in a designated and weatherproof hazardous waste store. A number of different disposal routes are available depending on the nature of the waste detailed in this policy.
- 4.3 Disposal of hazardous waste must only be undertaken through licenced waste contractors who have a valid upper tier waste carrier licence and permit for waste disposal in place and in date.

#### Identification and storage of hazardous waste

- 4.4 A checklist to help identify and dispose hazardous waste is shown in Appendix 1 and a list of potential hazardous waste categories can be found in Appendix 2.
- 4.5 When disposing hazardous liquid waste, this should be stored in a sealed and clearly labelled (with the content and quantity) container until collection. Flammable substances should be kept in a flammable store or appropriate area.
- 4.6 Different types of waste should not mixed - some materials when mixed increase the hazard level e.g. toxic or explosive.
- 4.7 The correct disposal method is detailed under each waste category below (paragraphs 4.13 – 4.25) and in appendix 1.
- 4.8 Contact the Property Portal or the Property helpdesk (LFBPropertyHelpdesk@Bellrockgroup.co.uk or via 89100 option 2) for all hazardous waste disposal except those items listed in paragraphs 4.16 - 4.20.
- 4.9 Contact the ICT Helpdesk on extension 89100 option 1 for disposal of items listed in paragraph 4.17.
- 4.10 Waste not identified in Appendix 2 is likely to be classified as hazardous if it carries any of the GHS hazard symbols in their individual COSHH assessments, as shown in Policy number 174 - Control of substances hazardous to health regulations 2002 policy.
- 4.11 COSHH assessments for substances ordered on POMS can be found here: [Brigade Wide Documents > Safety > Health & Safety > Risk assessments](#) and will indicate whether a substance is hazardous and any PPE that needs to be worn.
- 4.12 If you are still unsure whether the material or item should be disposed of as hazardous waste, contact the Sustainable Development Team ([environment@london-fire.gov.uk](mailto:environment@london-fire.gov.uk)).



- Example GHS hazard Symbols:

## **Minimisation of hazardous waste**

- 4.13 Contractors must remove their own waste from site, as detailed in Policy number 862 - Waste management. If hazardous waste is left behind by contractors, report to the Property Portal or the Property helpdesk (LFBPropertyHelpdesk@Bellrockgroup.co.uk or via 89100 option 2).
- 4.14 LFB staff are not to bring any personal hazardous waste onto Brigade's premises.
- 4.15 Hazardous waste, e.g. contaminated gas tight suits, should not be brought back from incidents or routine operations, see Policy number 206 - Environmental protection.
- 4.16 Only vehicles which have been fully de-polluted and obtained through POMS may be used for extrication training, see Policy number 843 - the supply of de-polluted vehicles (scrap cars).

## **Mobile phones and IT equipment recycling**

- 4.17 All Brigade mobile phones and IT equipment (e.g. monitors, keyboard, mouse, telephones etc.) must be returned to the ICT Helpdesk for recycling. This equipment must NOT be placed in any of the waste streams available at Brigade's premises.

## **Printer cartridge recycling**

- 4.18 Ink and toner cartridges are to be placed in a package and labelled as "attention of the operations support centre manager" and returned via the Brigade day van service (OSC) for recycling.
- 4.19 Where stock of unused printer cartridges is identified that are no longer suitable for the printers available at a site, they should be listed on WARP-It for reuse.

## **Battery recycling**

- 4.20 Batteries should be placed in the designated green bags located in an appropriate communal area e.g. watch rooms or dry hubs at Brigade Headquarters. When the bag is full, batteries need to be packed in a box, collected from the normal day van collection point and returned to the Operations Support Centre. This does not apply to batteries for equipment maintained by Babcock, Radio Workshops and the Operations Support Group.

## **Removal of waste from site**

- 4.21 When removed from site, all hazardous wastes require a completed and signed waste consignment note, provided by the approved contractor. This requires checking by the PIC that the contractor has completed parts A-C and the signature of the PIC in part D.
- 4.22 An example consignment note can be found here: [Hazardous waste: consignment note guidance](#).
- 4.23 The top copy of the consignment note must be retained on site in section 7 of the premises log book for 3 years. These are also held centrally and can be accessed via the Property Portal or the Property helpdesk (LFBPropertyHelpdesk@Bellrockgroup.co.uk or via 89100 option 2).
- 4.24 A consignee return (Section E) must be completed by the contractor and kept by Property. This shows that the hazardous waste has reached the final point of permitted disposal based on the permit details provided on the waste consignment note.
- 4.25 From 1 April 2016, premises no longer need to register as hazardous waste producers.

## 5 Responsibilities

### Managers

- 5.1 The PIC at any premises is responsible for ensuring:
- Hazardous waste production is minimised.
  - The correct identification of hazardous waste (see Appendix 1 and 2).
  - No hazardous waste enters the general waste system.
  - The appropriate storage and handling of hazardous and polluting materials in accordance with PN0747.
  - The appropriate documentation (waste consignment notes) is obtained and stored onsite for all hazardous waste that is removed from the premises.
  - All employees use the correct PPE recommended by the COSHH assessment when dealing with hazardous waste.
  - All staff understand this procedure and received the necessary training to ensure compliance with this procedure.

### Employees

- Must not under any circumstances bring items or materials on site that potentially will have to be disposed of as hazardous waste e.g. televisions.
- Must use the correct PPE when dealing with hazardous waste materials as detailed in the MSDS/COSHH documents.

### Assistant Director, Procurement and Commercial Services

- 5.2 Assistant Director, Procurement and Commercial Services is responsible for appointing all contractors who dispose of hazardous waste. A valid upper tier waste carrier license and waste permit should be available in the contract file for all contractors who handle hazardous waste.

### Records

- 5.3 Consignment notes and consignee returns must be retained for 3 years. These should be kept in Section 7 of the premises log book.

## 6 References

- 6.1 Controlled Waste (England & Wales) Regulations 2012 (SI 2012/811) as amended.
- 6.2 The End-of-Life Vehicles Regulations 2003 (SI 2003/2635) as amended.
- 6.3 The Hazardous Waste (England and Wales) Regulations 2005 (SI 2005/894) as amended.
- 6.4 Guidance on the classification and assessment of waste (1<sup>st</sup> edition 2015) Technical Guidance WM3.
- 6.5 The Waste Electrical and Electronic Equipment Regulations 2013 (SI 2013/3113) as amended.
- 6.6 The Waste (England & Wales) Regulations 2011 (SI 2011/988) as amended.
- 6.7 Policy number 862 – Waste management.
- 6.8 Policy number 747 – Polluting material storage and spillage procedure.
- 6.9 Policy number 206 – Environmental protection.
- 6.10 Policy number 490 – Person in control policy.

- 6.11 Policy number 489 – Premises log book.
- 6.12 Policy number 174 – Control of substances hazardous to health procedure.
- 6.13 Policy number 843 – The supply of de-polluted vehicles (scrap cars).

## Appendix 1 – Identify, store and dispose hazardous waste

**Important:** When handling any hazardous chemical refer to the COSHH or material safety data sheet for appropriate PPE requirements [[Brigade Wide Documents > Safety > Health & Safety > Risk assessments](#)].

### Checklist:

Does the waste fall into the waste categories listed in Appendix 2?	
Yes	No
<p><b><u>Store appropriately until collection as follows:</u></b></p> <ul style="list-style-type: none"> <li>• Weatherproof *</li> <li>• Sealed**</li> <li>• Clearly labelled***</li> <li>• Designated secure location – Hazardous waste store</li> </ul>	<p>Check the relevant COSHH/MSDS assessment (see above for link) or contact: <a href="mailto:environment@london-fire.gov.uk">environment@london-fire.gov.uk</a> for advice.</p>
<p><b><u>Dispose as hazardous waste</u></b></p> <p>Raise a collection order (where relevant – see section 4.13 to 4.20) by contacting:</p> <ul style="list-style-type: none"> <li>• the Property Portal or the Property helpdesk (LFBPropertyHelpdesk@Bellrockgroup.co.uk or via 89100 option 2).</li> <li>• ICT Helpdesk on extension 89100 option 1 for <u>ICT waste only</u></li> </ul>	
<p><b><u>Collection</u></b></p> <p>Keep records of collection (see section 4.21 to 4.25)</p> <ul style="list-style-type: none"> <li>• Upon collection, the supplier will require a signature and provide a copy of the Waste Consignment note.</li> <li>• Retain in Premises logbook (Section 7).</li> </ul>	

If spill has occurred – please refer to Policy number 747 - polluting material storage and spillage procedure.

\*Weatherproof – not exposed to weather conditions (e.g. rain).

\*\*Avoid leak to surrounding environment (e.g. vegetation or nearby drains in case of spillages).

\*\*\* Contents and quantity to pass on to the supplier when arranging collection.

## Appendix 2 - Hazardous waste categories

Waste Category
Waste engine, gear and lubricating oils
Waste Fuel Oil and Diesel
Waste Petrol
Other fuels (including mixtures)
Oil filters
Halon fire extinguishers
Fire alarms
Explosive components (air bags)
Brake fluids
Antifreeze fluids
Low and High Pressure Sodium Lamps
Gases in pressure containers (including halons) containing dangerous substances e.g. Butane Gas
Batteries (any)
Fire fighting foam containers
Fuel containers (oil and petrol)
Used spill kit equipment (sand, granules or spill kit)
Gas cylinders
Clinical Waste e.g. dressings
Solvents
Acids
Alkalines
Photochemicals
Detergents containing dangerous substances
Paints, Inks and Adhesives containing dangerous substances
Equipment containing CFC's
Fluorescent tubes and other mercury-containing waste
Packaging containing residues of or contaminated by hazardous substances
Waste electrical and electronic equipment (WEEE) e.g. mobile phone, TV, fire alarms
Soil contaminated with dangerous substances e.g. hydrant maintenance waste
Fire Fighting Foam
Sludge removed from interceptors
Hydrant maintenance waste



## Document history

### Assessments

An equality, sustainability or health, safety and welfare impact assessment and/or a risk assessment was last completed on:

EIA	14/09/2023	SDIA	H – 14/09/2023	HSWIA	05/03/2018	RA	n/a
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### Audit trail

Listed below is a brief audit trail, detailing amendments made to this policy/procedure.

Page/para nos.	Brief description of change	Date
Page 4 Para 4.5	Property and Procurement extension numbers updated.	06/05/2010
Throughout	CHSES replaced by HSS due to a change in the name of the department.	06/05.2010
Throughout	Change of helpdesk extensions.	12/05/2010
Throughout	Department names updated in line with the Top Management Review.	01/11/2011
Throughout	This policy has been reviewed as current. Minor changes have been made throughout in line with current legislation. Please read through to familiarise yourself with the content.	14/12/2011
Page 2	Reference to cancelled PN371 updated to PN206.	22/03/2013
Throughout	This policy has been reviewed as current, no changes made to the content. Subject list and FOIA exemptions tables on the document history page have been updated.	22/12/2014
Throughout Appendices	Changes have been made throughout in line with current legislation and to simplify the procedure. 4, 5 and 6 have been removed.	25/04/2016
Throughout	Reviewed as current, minor amendments made.	10/03/2017
Throughout	Changes made throughout to clarify the disposal procedure including schemes for specific items.	09/03/2018
Page 1	Changes to team and department names to reflect the abolition of the London Fire and Emergency Planning Authority, now replaced with the London Fire Commissioner.	19/02/2019
Page 4	Battery recycling information updated.	02/12/2019
Throughout	Reviewed as current with the following changes made.  Departmental name changes made. Head of Technical and Service Support replaced with Assistant Director, Technical and Commercial Services.  Brigade Distribution Centre (BDC) replace with Operations Support Centre (OSC) and Protection Equipment Group (PEG) replaced with Operations Support Group (OSG).	10/05/2021
Throughout	Reviewed as current with minor amendments made throughout.	25/09/2023

## Subject list

You can find this policy under the following subjects.

Disposal	Hazard material
Hazardous material	Waste

## Freedom of Information Act exemptions

This policy/procedure has been securely marked due to:

<b>Considered by:</b> (responsible work team)	<b>FOIA exemption</b>	<b>Security marking classification</b>