

Annex 7- T12 Manual treatment of waste

Part 1: Specific issues and proposed changes

	Issue detail	Rationale for change	Proposed changes
Risks from stockpiling	Stockpiling of waste is a common issue on T12 sites and can lead to risks of abandonment and fire.	No annual throughput currently - Added annual throughput for each waste type. Where appropriate this is expressed as a unit rather than a tonnage.	3 month storage to encourage turnover. Reduced all acceptance limits for each waste type.
Risks from combustible wastes	Some of the wastes have been identified as particularly vulnerable to the risk of fire.	All combustible wastes should have the same controls as identified in the Fire Prevention Plan Guidance to reduce and control the risk from fire where that risk is the same as a permitted site.	3 month storage limit for combustible wastes to align with the FPP Guidance. Waste stacks and piles limited to 4m high. Storage quantities less than that of permitted sites and therefore not all the FPP requirements are needed.
Storage of multiple wastes increasing overall risk	T12 has a wide range of wastes that can be stored and at the moment there is no limit on the total amount of waste that can be stored.	Reduce overall storage and throughput quantities to an order or magnitude less than standard rules and bespoke permits. Encourages throughput and discourages stockpiling which is a fire-risk and often reduces the recoverability of waste as it deteriorates over time.	Individual storage limits in m ³ for all waste types. Total of 300 m ³ of any of the wastes or combination of on site at any one time.
Treatment activities being carried out under T12	There are separate treatment limits depending on what sort of treatment is being carried out.	This makes understanding the quantity limits quite complicated. Under the new proposals the individual and overall limits are much reduced it and it makes less sense to have different limits.	Amalgamate treatment activities and put one single limit per waste type.
Unsuitable storage for recovery or reuse to be achieved	Wastes stored inappropriately cannot be recovered properly Following the waste hierarchy re-use should be a priority followed by recycling into another use.	Where storage outside is likely to reduce the reuse of the waste or reduce its capacity to be recycled then it should be stored indoors or in a covered container.	Made storage to be inside a building where storing outside would make the waste harder if not impossible to prepare for recycling or reuse.

	Issue detail	Rationale for change	Proposed changes
Unsuitable storage or treatment resulting in amenity issues	Some wastes give rise to amenity issues through noise, dust, odour or attraction of pests and vermin.	Some wastes especially if they are stockpiled outside provide places for vermin to live and can attract vermin and pests into an area. Wastes can also start to degrade more rapidly if they become wet and can cause odours. In addition degradation of the waste makes it harder if not impossible to prepare for recycling or reuse.	Made storage and or to be inside a building where waste can cause amenity issues or degrade.
Making storage a treatment limits clearer	Some wastes e.g. pallets have different limits set out in different rows depending on the type of treatment.	These can be confusing and the overall limits have been significantly reduced meaning that there is no need to have separate limits. This makes it simpler to understand and enforce.	Rows for treatment of windows and doors and for pallets have been merged.
Risks from specific types of waste Mattresses	There is and increasing problem with collection and stockpiling of mattresses. This leads to abandonment, risk of fire and attraction of pests nesting in the mattresses.	These wastes are easy to collect but difficult to dismantle and the resultants materials are of low-value. Profit is mainly through the collection or gate fee. It's likely that only through economies of scale provided by a permitted facility and through any future extended producer responsibility scheme would make this activity profitable and less likely to attract waste crime.	As a result we propose to remove mattresses from T12 altogether.
Waste coding and description	20 01 99 Bicycles 20 01 99 Footwear	Bicycles are vehicles and should be coded as 16 01 06. Footwear is classified as clothing and should be coded 20 01 10. Add 17 05 04 to allow stone only. Add 17 09 04 to windows to allow composites.	Add, remove or change relevant codes and descriptions.

Part 2: Option 2 - Proposal

T12 - Manual treatment of waste

All	Current conditions				Changes proposed under Option 2			
Specified activities	Waste specific but includes: Sorting, repairing, refurbishing, dismantling and associated storage.				Waste specific but includes: Sorting, repairing, refurbishing, dismantling and associated storage.			
General conditions applying to all wastes	None				<ul style="list-style-type: none"> • Must be treated and stored in a secure place. • The waste arrives at the place where the operation is carried out in an unmixed state. • Each waste type must be stored separately and not mixed together during any treatment. • Where more than one waste type is accepted at the site the total of all wastes accepted at the site must not exceed 500 tonnes per year. • Where more than one waste type is accepted at the site the total of all wastes stored at the site must not exceed 300 m³. • No waste stack before or after treatment may exceed the storage limits for the specified waste type. • Max stack height 4m. • Each pile or stack or where stored in a container each container must be accessible in case of fire. 			
Waste type	Waste codes	Annual acceptance (tonnes) / 7-day limit	Treatments	Storage limits and conditions	Waste codes	Annual acceptance	Treatments	Storage limits and conditions
Bicycles and bicycle parts only	20 01 99	None	Sorting, repairing or refurbishing	2 years 100 tonnes	16 01 06	1000 bicycles per year	Sorting, repairing or refurbishing	12 months 100 bicycles at any one time. Treatment and storage carried on indoors
Clothing, fabrics, carpets only	20 01 10 20 01 11	None	Sorting, repairing or refurbishing	2 years 100 tonnes	20 01 10 20 01 11	100 tonnes per year	Sorting, repairing or refurbishing	3 months 100 m ³ (17-27 tonnes depending on material) Treatment and storage carried on indoors
Coat hangers only	20 01 38 20 01 39 20 01 40	None	Sorting and dismantling	12 months 100 tonnes	20 01 38 20 01 39 20 01 40	50 tonnes per year	Sorting and dismantling	3 months 50 m ³ (11.5 tonnes)

All	Current conditions				Changes proposed under Option 2			
Domestic pots and pans only	20 01 40	None	Sorting and dismantling	2 years 100 tonnes	20 01 40	50 tonnes per year	Sorting and dismantling	12 months 50 m ³
Footwear only	20 01 99	None	Sorting, repairing or refurbishing	2 years 100 tonnes	20 01 10	100 tonnes per year	Sorting, repairing or refurbishing	3 months 100 m ³ (17-27 tonnes) Treatment and storage carried on indoors
Furniture only	20 03 07	None	Sorting, repairing or refurbishing	2 years 100 tonnes	20 03 07	50 tonnes per year	Sorting, repairing or refurbishing	12 months 200 m ³ (34 – 54 tonnes) Treatment and storage carried on indoors
Garden tools only	20 01 38 20 01 39 20 01 40	None	Sorting, repairing or refurbishing	2 years 100 tonnes	20 01 38 20 01 39 20 01 40	50 tonnes per year	Sorting, repairing or refurbishing	12 months 50 m ³
Lock gates only	20 01 38 20 01 39 20 01 40	None	Sorting and dismantling	2 years 100 tonnes	20 01 38 20 01 39 20 01 40	100 tonnes per year	Sorting and dismantling	12 months 50 lock gates
Mattresses only	200307	None	Sorting and dismantling	12 months 5 tonnes Treatment and storage carried on indoors				
Stone, bricks, wood only	17 01 02 17 02 01 17 09 04 20 01 38	None	Sorting, repairing or refurbishing	500 tonnes	17 01 02 17 02 01 17 09 04 20 01 38 17 05 04	100 tonnes per year	Sorting, repairing or refurbishing	12 months 100 m ³
Telegraph poles only	20 01 37* ¹ 20 01 38 20 01 40	None		12 months 100 tonnes	17 02 01, 17 02 04*	100 tonnes per year	Sorting and dismantling	12 months 200 telegraph poles

¹ an asterisk (*) next to a code denotes that it is hazardous waste.

All	Current conditions				Changes proposed under Option 2			
Windows, doors only	17 02 01 17 02 02 17 02 03 20 01 02 20 01 38 20 01 39 20 01 40	None	Sorting, repairing or refurbishing	100 tonnes - sorting , repairing or refurbishing (2 years) 10 tonnes sorting and dismantling (12 months)	17 02 01 17 02 02 17 02 03 20 01 02 20 01 38 20 01 39 20 01 40 17 09 04	100 tonnes per year	Sorting, repairing, refurbishing or dismantling	3 months 50 m ³
Wooden pallets only	15 01 03	None	Sorting, repairing or refurbishing	100 tonnes - sorting , repairing or refurbishing (2 years) 100 tonnes sorting and dismantling (12 months)	15 01 03	100 tonnes per year	Sorting, repairing, refurbishing or dismantling.	3 months 100 m ³