

Is it a Hazard?

The thorny issue of hazardous waste generated by boats and boating continues to trouble us. Sarah Black from The Green Blue has been getting to the bottom of the issue.

Is your paint costing the earth?

We all know by now that we must take care with our waste. Most people are recycling whenever they can and are doing their best not to dump old oil, fuel and other toxic substances down the drain. We have even got our heads around issues such as getting rid of organic waste, composting has become commonplace. The question remains, what is considered hazardous waste and what is not?

What is Hazardous Waste?

You might think this is an easy question to answer, anything which is toxic, nasty, damaging or otherwise bad for you and the environment. Right? Almost. Two pieces of legislation came into force on 16 July 2005 which specifically cover waste, these are:

- The Hazardous Waste Regulations (and matching Directive) 2005 (HWR)
- The List of Waste Regulations 2005 (LoWR)

Help is at hand. The Environment Agency have tried to guide us through the process and have produced 'WM2 Hazardous Waste: Interpretation of the definition and classification of hazardous waste', or WM2 for short. Catchy title!

WM2 has a number of appendices including the European Waste Catalogue which attempts to list all of the known typically hazardous waste streams. So the question then becomes, are you, or rather, is *your waste* on the list?

Bottom of the Barrel

Antifoul is a perfect example of the minefield facing those trying to responsibly deal with their waste. Antifoul contains biocides which are toxic to marine (and other) life. Preventing excess amounts being released into the environment is essential if we are to prevent a negative impact on the oceans that we love so much. But are the tin, brushes, rollers and trays considered as hazardous waste?

The answer depends first on what is in it and secondly on how much do you have? All antifoul should now have what are called 'Risk Phrases' or 'R Codes', and these should be displayed on the container and in the Safety Data Sheet. That is the easy bit. The difficult bit is assessing whether the R Codes relate to a danger to you or the environment.

Each R Code has a different risk factor associated with it and therefore a different 'hazardous waste threshold level'. For example, most antifouls have R20, 38 and many have R41 codes listed. R20 means it is harmful by inhalation but your paint tin or brush would need to be made up of 25% by weight of that material for it to be classified as hazardous waste. On the other hand R41 materials are of serious risk to the eyes and less than 10% of the weight of your waste would need to be made up of that in order to be classified as hazardous waste.

So where does this leave us?

For small businesses and individuals it can be difficult to spend a lot of time or money sorting through the rubbish, reading paint cans and cross referencing with a handy library of documents.

The broad brush (if you will forgive the pun) approach must be a precautionary one. Most anti-fouling tins, because of the weight ratios of the threshold levels and the toxicity of the ingredients, will be classified as hazardous. Most rollers and trays will probably fall into that category too.

Just occasionally you may be able to get enough paint out of your brush and onto the hull to avoid classifying those at least...but seeing as how you were going to the recycling facility anyway

Legal Requirement

From the 6th April 2009, you need to register with the Environment Agency if you produce over 500kg's of hazardous waste in 12months. To register contact the Environment Agency on 0870 8502 858 or visit their website: www.environment-agency.gov.uk

More information, including the Environment Agency interpretation materials can be found on The Green Blue's website, www.thegreenblue.org.uk