

3. HAZARDOUS WASTE ACCEPTANCE CRITERIA BURWOOD IMPROVEMENTS

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The purpose of this report is to gain approval for the implementation of improved landfill hazardous waste acceptance criteria at Burwood Landfill.

INTRODUCTION

In July 2000, the City Services Committee was presented with an update of the (Pilot) Regional Hazardous Waste Reduction Programme. It was resolved at this meeting: *“That as soon as possible a bylaw be prepared to ban known hazardous substances from landfill dumping especially where alternative methods of disposal are already in existence”*. The same report presented to the July Canterbury Waste Subcommittee recommended *“That all participating councils be encouraged to prepare in the near future a bylaw banning known hazardous substances from landfill dumping especially where alternative methods of disposal are already in existence”*.

As a result of these recommendations, the feasibility of implementing a new bylaw has been investigated alongside current management practices in regard to hazardous waste disposal. These investigations have confirmed the need to update the Landfill’s hazardous waste acceptance criteria.

CURRENT MANAGEMENT

Ideally, hazardous wastes should be kept out of the landfill altogether, and more and more options are becoming available as alternatives to landfill dumping. However, lack of sufficient quantities of hazardous wastes, inhibitory costs, and/or lack of disposal alternatives continue to make co-disposal in landfills the best alternative. While this is the case, all efforts should be made to truly minimise the effects of these wastes on the environment.

In order to manage the handling and disposal of hazardous wastes in the city’s landfill, it is important to know what one is dealing with and have a system for acceptance that minimises the effects of those wastes on the environment. To achieve this, hazardous waste acceptance criteria were proposed as part of the management plan written for the Burwood Landfill consent application. These criteria can be seen in Attachment 2. The criteria as written provide the minimum requirements for the disposal of hazardous wastes into the Landfill. In practice these criteria have been tightened up with time, and staff administering the manifest system that is used to manage special wastes accepted at Burwood, require that the ‘best practicable option’ is undertaken with each request. This process is expounded as follows.

For commercial hazardous wastes to be deposited at Burwood Landfill, contact is made in the first instance to the Council’s Hazardous Waste Advisory Service from Environmental Services Unit (HWAS). The HWAS then assess whether the waste in question can be reused, recycled or treated in some way to avoid depositing in the landfill. If disposal to landfill is the only option, then leachate testing is undertaken to ensure that the waste meets current acceptance criteria. Note that in this context “current” means the tighter criteria that the HWAS have developed since the original consent conditions were specified. Once clearance has been given, the disposer is issued with a manifest (with conditions in some instances) allowing the waste to be disposed of to landfill. Copies of the manifest are then made available to the landfill manager, the disposer and the HWAS to create an audit trail.

The current system works well and it is believed it is effective in ensuring that significant quantities of hazardous or special waste do not go to the landfill undetected. However in reviewing this system, and the waste acceptance criteria, some potential for improper disposal has been identified, in particular:

- The possible placing of hazardous wastes in commercial skips, the transfer of this waste from the skip to the refuse station, then to the landfill undetected.
- The possible lack of honesty by some waste disposal operators/treaters in the declaration of the composition of the hazardous waste via the manifest system.

ACCEPTANCE CRITERIA DEVELOPMENTS

While at present there is no national consistency in the derivation and application of acceptance criteria, or any national guidelines to which councils can refer, the Ministry for the Environment is soon to announce national waste acceptance criteria at landfills. It is further worth noting that the new regional landfill is expected to operate under strict standards in line with these national criteria.

TIGHTER RESTRICTIONS

It is considered that a new bylaw simply prohibiting the deposit of hazardous substances to landfill is not the best way to achieve hazardous waste environmental improvements at Burwood at this time. Rather, the acceptance criteria be updated to reflect the 'best practicable option' for disposal (see Attachment 1), and the monitoring and enforcement system for managing this system be reviewed to prevent unauthorised/unmanaged dumping of hazardous wastes to landfill. This can be carried out under the umbrella of the existing Refuse Bylaw¹.

It is therefore proposed that Christchurch City Council formally adopt these updated hazardous waste acceptance criteria in the interim period (i.e. from now until the new regional landfill opens and/or national criteria are imposed) in order to align them with current practice and to prepare hazardous waste generators for future obligations. Furthermore, these wastes will continue to be accepted on a case by case basis, through the manifest system that approves and records their acceptance. The proposed criteria include banning certain substances for which alternative disposal paths are available. Following an education programme, random audits of incoming loads would be carried out. It is also considered that it will be necessary to have an infringement penalty fee as part of this enforcement system. A penalty fee of \$2000 is proposed for any attempt to dispose of hazardous waste without a manifest, or to misrepresent any waste that is being disposed of through the manifest system. Details of this matter need to be cleared with the Legal Services Manager.

HOUSEHOLD HAZARDOUS WASTES

It is proposed that in conjunction with the new acceptance criteria, an education programme be arranged with the objective of informing the public of the proper disposal paths for common household hazardous wastes

THE NATURAL STEP

Note that the proposed changes suggested by this Report are in accordance with the principles of The Natural Step, in that the adopted criteria will produce an incentive for reduction, re-use and recycling, thus reducing the need to extract more from the earth's crust, re-integrating hazardous substances into the cycles of nature, and protecting bio-diversity and ecosystems.

SUMMARY

This report has illustrated that current waste acceptance criteria at Burwood as worded needs updating. Adopting stricter standards now is opportune, as it will allow a 'breaking-in' period before possible national criteria are put in place and the opening of the new regional landfill. It is acknowledged, however, that adoption of new criteria on their own will not improve the current situation. The manifest system, the capability of the laboratory, and the increased monitoring required to enforce the updated criteria will need to be reviewed in conjunction with any changes. These considerations are reflected in the recommendations to follow.

- Recommendation:**
1. That the Council adopt enhanced landfill acceptance criteria, as proposed in this report (Attachment 1).
 2. That these criteria be put into effect upon completion of a notification/education programme directed at affected companies with a target date of end September 2001.
 3. That the Legal Services Manager investigate options for imposing penalties.
 4. That an education programme be arranged to inform householders of the appropriate disposal method for common household wastes.
 5. That the report be also referred to the Canterbury Waste Subcommittee for recommendation to other participating councils.

¹ Clause 22 of the Christchurch City Refuse Bylaw 1995 states that:

"The disposal of refuse on any land or premises set aside by the Council for the disposal of refuse shall be subject to such conditions as the Council may from time to time by resolution impose in respect of the hours of opening and closing, the nature of the refuse which may be disposed of, the charges in respect to such disposal, the position in any such place in which refuse may be placed, and any other matters which the Council may consider necessary".