

The Chartered Institution of Wastes Management (CIWM) is the professional body which represents around 6,300 waste management professionals, predominantly in the UK but also overseas. The CIWM sets the professional standards for individuals working in the waste management industry and has various grades of membership determined by education, qualification and experience.

## **Standard Rules No. 12 – Industrial Emissions Directive (IED)**

The Institution welcomes the opportunity to comment on these Standard Rules consultation and has asked its members and healthcare special interest group (SIG), biological treatment SIG and thermal treatment SIG to comment and their feedback has helped form CIWM's response.

*Q1. Do you agree with the proposed changes we have set out in this consultation?*

### **SR 2008 No. 24 Clinical Waste and Healthcare Waste Transfer Station**

1 - Introductory note – this is in the old layout, updated versions (2012) do not include information on SSSI, Zone 1 groundwater protection – these are all now within the standard rule, see comment 5 below.

2 - This standard rule is being amended under the IED but there is nothing in the standard rule in relation to energy efficiency or raw materials as in SR 2012 No. 4 Composting in closed systems – sections 1.2 and 1.3.

3 - Again under IED other standard rules have been changed and Table 2.1 Activities in SR 2012 No. 4 has a different layout, should SR 2008 No. 24 not have the same layout in Table 2.1?

4 - Also in Table 2.1 under the Limits of activities the new text relating to the maximum quantity is not the same as SR 2008 No. 25 which also includes text in relation to aggregation. Should the wording be the same?

5 - 2.2 The site – later versions that have been updated (2012) have information about Ramsar, SSSI and Groundwater Protection etc here. CIWM suggests this standard rule is updated the same – see SR 2012 No. 7.

6 - Interpretation 4.3.1 mentions "...schedule 6..." all other more recent standard rules have "In these standard rules the expressions listed below shall have the meaning given in that schedule." CIWM assumes SR 2008 No. 24 needs updating in this paragraph.

7 - Clinical waste – the reference to the legislation is incorrect. It should be Controlled Waste (England and Wales) Regulations 2012.

8 - Typographical errors:

Paragraph 1.1.4

There is a full stop missing from the end of the sentence.

Table 2.1 activities should begin with a capital A, all other table headings do.

### **SR 2008 No. 25 Clinical Waste Healthcare Waste Treatment and Transfer Station**

1 - Introductory note – this is in the old layout, updated versions (2012) do not include information on SSSI, Zone 1 groundwater protection – these are all now within the standard rule, see comment 5 below.

2 - This standard rule is being amended under the IED but there is nothing in the standard rule in relation to energy efficiency or raw materials as in SR 2012 No. 4 Composting in closed systems.

3 - This standard rule is being amended under the IED but there is nothing in the standard rule in relation to energy efficiency or raw materials as in SR 2012 No. 4 Composting in closed systems – sections 1.2 and 1.3.

4 - Again under IED other standard rules have been changed and Table 2.1 Activities in SR 2012 No. 4 has a different layout, should SR 2008 No. 24 not have the same layout in Table 2.1?

5 - Also in Table 2.1 under the Limits of activities the new text relating to the maximum quantity is not the same as SR 2008 No. 25 which also includes text in relation to aggregation. Should the wording be the same?

6 - 2.2 The site – later versions that have been updated (2012) have information about Ramsar, SSSI and Groundwater Protection etc here. CIWM suggests this standard rule is updated the same – see SR 2012 No. 7.

7 - Interpretation 4.3.1 mentions “...schedule 6...” all other more recent standard rules have “In these standard rules the expressions listed below shall have the meaning given in that schedule.” CIWM assumes SR 2008 No. 24 needs updating in this paragraph.

8 - Clinical waste – the reference to the legislation is incorrect. It should be Controlled Waste (England and Wales) Regulations 2012.

Typographical errors:

Paragraph 1.1.4

There is a full stop missing from the end of the sentence.

Table 2.1 activities should begin with a capital A, all other table headings do.

Table 2.1 fourth bullet point under Limits of activities, CIWM suggests has a full stop at the end of the sentence.

Table 2.3 - sentence under Maximum Quantities needs a full stop at the end of the sentence.

Table 2.3a – Code 09 01 CIWM suggests wastes should be lower case as for all other codes.

Table 2.3c – Foot note 1 under the table needs a full stop at the end of the sentence.

Under 2.6 there is a table that is labelled Table S2.6 – CIWM believes the S is in error. Also at the bottom of part 5 of this table, the last sentence needs a full stop at the end of the sentence.

Paragraph 2.9.1 needs a full stop at the end of the sentence.

Paragraph 3.5.1 needs a full stop at the end of the sentence.

Table 3.5 – CIWM believes there needs to be some consistent formatting of the "...sample points <10m.." or "sample points >10m...".

Table 3.5, footnote 1 – CIWM suggests a colon needs to be added at the end of the sentence before the bullet points.

**SR 2012 No. 3 Composting in Closed Systems**

1 - Title – the consultation document suggests that the title has been amended to include "treatment". CIWM does not see treatment in the title unlike SR 2012 No. 10.

Typographical errors:

Table 2.1 – Limits of activities - to be consistent all full stops should be deleted.

Paragraph 2.3.2 – needs a full stop at the end of the sentence.

Table 2.3, code 03 03 11 – CIWM suggests sludges needs to be lower case as for all the rest.

Table 2.3, code 07 02 13 – CIWM suggests waste needs to be lower case.

Table 2.3, code 16 10 02 – CIWM suggests liquor needs to be lower case.

Table 3.1 – Sentence text needs a full stop at the end.

Paragraph 3.6.1 – needs a full stop at the end of the sentence.

### **SR 2012 No. 4 Composting in Closed Systems – Part A Installation**

1 - 2.2 The site – CIWM suggests having the same text as for SR 2012 No. 7.

2 - Interpretation 4.4.2 mentions “In these standard rules the expressions listed below shall have the meaning given.” CIWM suggests all other standard rules have this text. There are others that have “In these standard rules the expressions listed below shall have the meaning given in that schedule.”. E.g. SR 2012 No. 3, SR 2012 No. 7, SR 2012 No. 10 and SR 2012 No. 12.

#### Typographical errors:

Table 2.1 - activities should be upper case as for all other table headings.

Table 2.1 – full stops in the first and third point under “Description of specified activity...” do not need to be there for consistency. Full stop on second point under “Limits of specified...” does not need to be there for consistency.

Table 2.3 – code 03 03 11, code 07 02 and 07 02 13, code 16 10 and 16 10 02, code 19 06 05 and 19 06 06 – CIWM suggests need to be lower case as the rest of text.

Paragraph 3.1.1 – needs a full stop at the end of the sentence.

Table 3.1 – needs a full stop at the end of the text sentence.

Paragraph 4.4.2 – needs to be indented.

### **SR 2012 No. 7 Composting in Open Systems**

1 - Title – the consultation document suggests that the title has been amended to include “treatment”. CIWM does not see treatment in the title unlike SR 2012 No. 10.

2 – Table 2.3 Waste types and quantities – SR 2012 No. 3 and No. 4 both have 16 10 02 and the consultation document states this has been added to fit with the quality protocol. CIWM is asking should this code also be added to this standard rule.

3 - Interpretation 4.4.1 mentions “In these standard rules the expressions listed below shall have the meaning given in that schedule.” CIWM suggests changing as in point 2 under SR 2012 No. 4.

Typographical errors:

Paragraph 1.1.3 – the text needs indenting.

Table 2.1 – Limits of activities - to be consistent all full stops should be deleted.

Paragraph 2.2.1 – the text needs indenting.

Paragraph 2.3.2 – needs a full stop at the end of the sentence.

Table 2.3 – Exclusions, first bullet point – there are two commas after the “...(except sawdust)...” bracket.

Table 2.3 – code 03 01 05, code 07 02 13 and code 15 01 02 need to be lower case to match the rest of the text.

Paragraph 2.4.1 – needs indenting.

Table 2.4, first bullet point – needs a full stop at the end of the sentence.

Paragraph 3.1.1 – needs text indenting.

Paragraph 3.1.3 – needs text indenting.

Paragraph 3.2.1 - needs text indenting.

Paragraph 3.3.1 - needs text indenting.

Paragraph 3.4.1 - needs text indenting.

Paragraph 3.5.1 - needs text indenting. Also needs a full stop at the end of the sentence.

Paragraph 3.5.2 - needs text indenting.

Paragraph 4.1.2 - needs text indenting.

Paragraph 4.2.1 - needs text indenting.

Paragraph 4.2.2 - needs text indenting.

Paragraph 4.3.2 - needs text indenting.

Paragraph 4.3.3 - needs text indenting.

Paragraph 4.4.1 - needs text indenting.

Paragraph 4.4.2 - needs text indenting.

### **SR 2012 No. 8 Composting in Open Systems – Part A installation**

#### Typographical errors:

Table 2.1 Activities – full stop in first and third point under “Description of specified ...” does not need to be there.

Paragraph 2.3.2 – needs a full stop at the end of the sentence.

Table 2.3, code 03 01 05, code 07 02 13 and code 15 01 02 needs to start with lower case to match the rest of the text. Code 15 01 02 also needs lower case compostable. Code 17 05 06 has an extra space just after the opening bracket. Code 19 12 01 does not need a full stop.

Table 2.4, first bullet point – needs a full stop at the end of the sentence.

Paragraph 3.2.1 – there is an extra full stop on the end of the sentence.

Paragraph 4.3.1 (a) (ii) – to be consistent with other paragraphs written in this way CIWM suggests after “...or accident...” there should be a semi colon and the semi colon removed from the end of this sentence.

Paragraph 1.3.1 (a) (iii) – there should be a full stop and not a semi colon at the end of the sentence.

Paragraph 4.3.1 (b) (i) – change the comma after Environment Agency to a semi colon.

Paragraph 4.3.1 (b) (ii) – there should be a full stop and not a semi colon at the end of the sentence.

## **SR 2012 No. 10 On-farm Anaerobic Digestion Facility using Farm Wastes Only, Including use of the Resultant Gas**

1 - Introductory note – the last paragraph of text on other standard rules in relation to source emissions into water bodies is different to this standard rule text and CIWM suggests this introductory note is reviewed and written in the same format for ease of reading. See SR 2012 No. 7.

2 - Paragraph 2.2.2 – this should be consistent with SR 2012 No. 7 but adapted for AD.

3 - Paragraph 2.2.2 (c) – CIWM assumes this is included because of the requirement for gas engine stack. It is not included in SR 2012 No. 12 – consistency please, should it be in this standard rule as well as SR 2012 No. 12.

5 – Paragraph 2.2.3 CIWM is a little confused by the text here and suggests it is checked for clarity, especially 2.2.3 (b).

5 - Interpretation 4.4.1 mentions “In these standard rules the expressions listed below shall have the meaning given in that schedule.” CIWM suggests changing as in point 2 under SR 2012 No. 4.

### Typographical errors:

Introductory note – second line of opening paragraph has different font size “...up to 100 tonnes waste per day...on farm activities. The permitted activities include...”.

Table 2.1, Description of activities – CIWM suggests R13, R3 and R1 need to be in bold as for all other standard rules.

Table 2.1 – Limits of activities - to be consistent all full stops should be deleted. Full stop at the end of R1 should be removed.

Paragraph 2.3.2 – there needs to be a full stop at the end of the sentence.

Table 2.3 – title should be “Waste types”. Sub heading should be “Maximum quantities”. First column heading should be “Waste codes”.

Table 2.3, code 02 05 – “Wastes from...” should start with lower case to be consistent.

Table 2.4 – title should be “Operating techniques”.

Table 2.4 – bullet points need to be renumbered as you have no text in bullet point 3. Ideally CIWM suggests that Table 2.4 on SR 2012 No. 12 is incorporated into this standard rule.

Paragraph 3.1.2 – needs a full stop at the end of the sentence.

Table 3.1 – sub headings on column 1 and 3 need to be in lower case after first word, to be consistent with all other standard rules.

Table 3.1 – need to remove full stops from text in “Monitoring Frequency...” column.

### **SR 2012 No. 12 Anaerobic Digestion Facility Including use of the Resultant Gas**

1 - Introductory note – the last paragraph of text on other standard rules in relation to source emissions into water bodies is different to this standard rule text and CIWM suggests this introductory note is reviewed and written in the same format for ease of reading. See SR 2012 No. 7.

2 - Paragraph 2.2.2 – this should be consistent with SR 2012 No. 7 but adapted for AD. There is no mention of the Air Quality Management Area as in SR 2012 No. 10.

3 – Paragraph 2.2.3 –this needs to be consistent, see SR 2012 No.10.

4 – Table 2.4 – CIWM suggests this table is incorporated into SR 2012 No. 10.

5 - Interpretation 4.4.1 mentions “In these standard rules the expressions listed below shall have the meaning given in that schedule.” CIWM suggests changing as in point 2 under SR 2012 No. 4.

#### Typographical errors:

Introductory note – second line of opening paragraph has different font size “...up to 100 tonnes waste per day...on farm activities. The permitted activities include...”.

Table 2.1 – Limits of activities - to be consistent all full stops should be deleted. Full stop at the end of R1 should be removed.

Table 2.1, Description of activities – CIWM suggests R13, R3 and R1 need to be in bold as for all other standard rules.

Paragraph 2.3.1 (c) – this should be “the waste is biodegradable.”.

Table 2.3 sub heading – should be “Maximum quantities”.

Table 2.3, code 02 07 99, code 03 03 08, code 15 01 01, 15 01 03 and 15 01 05, code 20 01 01 and 20 03 02 – does not need a full stop at the end.



Table 2.3, code 15 01 02 and 15 01 03, code 16 10 and 16 10 02 – should start with lower case.

Table 2.3, code 19 06 04, 19 06 05 and 19 06 06 – different font size for the text in the brackets, needs to be consistent with 19 06 03.

Table 2.4 table heading – should be “Operating techniques”.

Paragraph 3.1.2 – needs a full stop at the end of the sentence.

Table 3.1 – sub headings on column 1 and 3 need to be in lower case after first word, to be consistent with all other standard rules.

Table 3.1 – need to remove full stops from text in “Limit (including units)” and “Monitoring Frequency...” column.

Table 3.1, Parameter column – spacing would make this easier to read and so text in Limit column would also need to be spaced to relate to parameter.

### **SR 2012 No. 13 Treatment of Incinerator Bottom Ash (IBA) – Part A Installation**

1 - Paragraph 2.2.2 - this should be consistent with SR 2012 No. 7.

#### Typographical errors:

Introductory note, last bullet point – should have a full stop and not a semi colon at the end of the sentence.

Table 2.1, heading – the heading should start with a capital.

Table 2.1, sub heading “Limits of specified...” – no need for full stops at the end of the points.

Table 2.3, sub heading – should be “Maximum quantities”.

Table 2.3 – there should be a full stop at the end of the text under Maximum quantities.

Table 2.3, code 19 01 – “Wastes...” should be lower case and this sub heading should be grey as for all other standard rules.

Table 2.3, code 19 01 12 – there is no need for a full stop at the end.

Table 2.4, point 1 – there is no need for a comma after “...storage”

Table 2.4, point 2 – there needs to be a full stop at the end of the second bullet point.

Table 2.4, point 8 – procedures should be in lower case.

Paragraph 3.1.2 – there needs to be a full stop at the end of the sentence.

Paragraph 3.3.1 – there is an extra full stop.

Paragraph 4.3.1 (a) (i) – there should be a semi colon and not a comma at the end.

Paragraph 4.3.1 (a) (ii) – there should be a semi colon after accident, not a comma.

Paragraph 4.3.1 (a) (iii) – there should be a full stop and not a semi colon at the end.

Paragraph 4.3.1 (b) (i) – there should be a semi colon after Agency and not a comma.

Paragraph 4.3.1 (b) (ii) – there should be a full stop and not a semi colon at the end.

### **SR 2010 No. 12 Treatment of Waste to Produce Soil, Soil Substitutes and Aggregate**

1 – Introductory note – this needs updating in the same style as those from 2012 where the list of water sources are now part of the standard rule and not included in the introductory note.

2 – Table 2.1 – was there any reason for the last point to be highlighted?

3 - Paragraph 2.2.2 – this needs to be checked with all other standard rules to make sure the same information is used for all.

4 – Paragraph 2.2.2 d – it might be worth putting this acronym in full.

5 – Emissions and monitoring – there is nothing on point source emissions, CIWM asks should there be?

6 – Emissions and monitoring – there is nothing about Pests or Monitoring as for 2012 versions of standard rules.

7 - Paragraph 4.3.4 – CIWM suggests this should be reformatted as in 2012 versions.

Typographical errors:

Paragraph 1.2.1 (a) to (c) - need to be indented.

Table 2.1 – points under both columns do not need full stops at the end.

Table 2.3, sub heading Exclusions – the text under this heading does not need to be in bold.

Paragraph 2.4.1 – the text needs indenting.

Table 2.4 – this needs reformatting as no other standard rule has as list of wastes in this table.

### **SR 2009 No. 2 Low Impact Part A Installation**

1 – Introductory note – this needs updating.

2 – Management – there is no 1.2, should there be. Because of this the numbering is all out – 1.3 should be 1.2, 1.4 should be 1.3 and 1.5 should be 1.4.

3 – Section 2.2 and 2.3 in SR 2012 No. 7 for example is in a different order, so The site is 2.2 and Waste acceptance is 2.3. CIWM suggests this standard rule is formatted the same as 2012 No. 7.

4 – There is no 2.4 Operating techniques – should there be?

5 – Emissions and monitoring – there is no section 3.5 on Pests or 3.6 on Monitoring.

6 – Notifications needs to be formatted the same as SR 2012 No. 7.

#### Typographical errors:

Paragraph 1.5.1 (a) to (c) – needs to be indented.

Last paragraph under 1.5 should be labelled 1.4.2.

Table 2.1 – activities heading should be in capitals. Points under both columns do not need full stops.

### **SR 2009 No. 3 Low Impact Part A Installation for the Production of Biodiesel**

1 – Introductory note – needs to be updated and there is no line saying End of introductory note.

2 – There is no section 1.2 and so the following paragraphs need to be renumbered. See point 2 under SR 2009 No. 2.

3 – The site – this needs to be fully updated as for SR 2012 No. 7.

4 – Emissions and monitoring – there is no section 3.5 on Pests or 3.6 on Monitoring.

Typographical errors:

Table 2.1 – activities heading should be in capitals. Points under both columns do not need full stops.

*Q2. Are there any barriers to complying with the standard rules?*

CIWM is not aware of any barriers.

*Q3. Please tell us if you have any other views or comments on these proposed revisions that have not been covered by previous questions?*

Some of these standard rules have version numbers and CIWM suggests that all standard rules have the version numbers printed at the bottom of the page as in SR 2012 No. 8.

## Household Packaging

### **SR 2008 No. 13 Non Hazardous and Hazardous Household Waste Amenity Site**

1 – Introductory note – needs to be updated. CIWM suggests checking the format of SR 2012 No. 7.

2 – All other standard rules within this consultation from 2012 have The site before Waste acceptance, CIWM suggests this standard rule has The site at 2.2 and update the text to the same format as SR 2012 No. 7 for example.

3 – Technical requirements – Hazardous waste storage and treatment – is this a sub heading, if so CIWM suggests it is numbered appropriately and the following text numbered so.

4 – Emissions and monitoring – there is no section 3.5 on Pests or 3.6 on Monitoring.

5 – Notifications – CIWM suggests this needs to be updated as for SR 2012 No. 4.

Typographical errors:

Paragraph 1.2.1 (a) to (c) – needs to be indented.

Table 2.1 – activities heading should be in capitals. Points under Limits of activities column do not need full stops.

Table 2.2, sub heading – should be “Maximum quantities”.

Table 2.2 – the bullet point under Exclusions needs to have a full stop at the end.

Table 2.2, codes 17 01 01 and 17 01 02; codes 20 01 02, 20 01 10, 20 01 11, 20 01 13, 20 01 14, 20 01 15, 20 01 17, 20 01 19, 20 01 23, 20 01 27, 20 01 28, 20 01 29, 20 01 30, 20 01 39 and 20 01 40 should be all lower case.

**SR 2008 No. 14 Materials Recycling Facility**

1 – Introductory note – needs to be updated. CIWM suggests checking the format of SR 2012 No. 7.

2 – All other standard rules within this consultation from 2012 have The site before Waste acceptance, CIWM suggests this standard rule has The site at 2.2 and update the text to the same format as SR 2012 No. 7 for example.

3 – Emissions and monitoring – there is no section 3.5 on Pests or 3.6 on Monitoring.

4 – Notifications – CIWM suggests this needs to be updated as for SR 2012 No. 4.

Typographical errors:

Paragraph 1.2.1 (a) to (c) – needs to be indented.

Table 2.1 – activities heading should be in capitals. Points under Limits of activities column do not need full stops.

Table 2.2, sub heading – should be “Maximum quantities”.

Table 2.2 – the bullet point under Exclusions needs to have a full stop at the end.

Table 2.2, codes 20 01 02, 20 01 10, 20 01 11, 20 01 39 and 20 01 40 should be all lower case.

**SR 2008 No. 15 Materials Recycling Facility (no building)**

1 – Introductory note – needs to be updated. CIWM suggests checking the format of SR 2012 No. 7.

2 – All other standard rules within this consultation from 2012 have The site before Waste acceptance, CIWM suggests this standard rule has The site at 2.2 and update the text to the same format as SR 2012 No. 7 for example.

3 – Emissions and monitoring – there is no section 3.5 on Pests or 3.6 on Monitoring.

4 – Notifications – CIWM suggests this needs to be updated as for SR 2012 No. 4.

Typographical errors:

Paragraph 1.2.1 (a) to (c) – needs to be indented.

Table 2.1 – activities heading should be in capitals. Points under Limits of activities column do not need full stops.

Table 2.2, sub heading – should be “Maximum quantities”.

Table 2.2 – the bullet point under Exclusions needs to have a full stop at the end.

Table 2.2, codes 20 01 02, 20 01 10, 20 01 11, 20 01 39 and 20 01 40 should be all lower case.

*Q1 Do you agree with the proposed new waste codes that we have set out in section 3 of this consultation?*

CIWM believes the additional codes are a pragmatic approach.

*Q2 Please tell us if you have any other views or comments on these proposed revisions that have not been covered by the previous question.*

## **Fire Prevention Plan**

*Q1. Do you recognise the need to control fire risk at sites dealing with combustible waste by the production of a fire prevention plan approved by the Environment Agency?*

CIWM supports the approach the Environment Agency have taken in its attempt to control fire risk.

CIWM has spent some time checking and updating all the standard rules read but there are some that have not been read and CIWM suggests these are checked for some of the comments in relation to all sections being complete – i.e.

Point 3 in SR 2012 No. 7 and Introductory notes being the same such as point 1 under SR 2012 No. 12. Please check all the other standard rules for consistency.