Dangerous Goods and Waste Management

Dangerous goods (DGs) regulations are an important consideration for the waste management industry. 10+ years after the National Standard for the Storage and Handling of Workplace DGs was released, Australia has consistent dangerous goods regulations in virtually every state and territory. Northern Territory just came on board with Tasmanian putting in their legislation last year. These regulations are now about 95% similar across Australia.

Fortunately for waste management only land transport and storage and handling of DGs are of interest. These have two distinct regulatory parts: 1) Storage and Handling and 2) Road and Rail Transport. In NSW, for example, this is split between DECCW for transport and WorkCover for on-site storage and handling.

So where does the waste management industry need to use DG regulations? The answer is in many areas. DG regulation especially affects the transport, handling and storage of hazardous wastes, largely capturing liquid wastes. The NSW Waste Classification Guidelines calls up the Australian Dangerous Goods Code 7th edition (ADG7) in order to properly and hopefully quickly define a waste as being a DG or not. ADG7 is an Australianised version of the UN's Orange Book, on which all DGs are based. For example, liquid wastes with pHs of less than 2 to greater than 12.5 can be given class 8 corrosive substances classification. This is much less costly in time and money than the skin narcosis test otherwise used.

While ADG7 is specifically written for transport of DGs, it is also used as reference for storage and handling on site, such as defining what are DGs. Workplace storage and handling affect waste management as many DGs wastes and products are used. Importantly, being a waste material does not change the way the DG is stored or handled, it is the same as for a new product. Empty drums still hold DGs unless they are cleaned. Under DG storage Regulations a risk assessment has to be prepared for every DG substance stored and used on site. Clarification on this and many other parts of the DG regulation are contained in the Codes of Practice for the Storage and Handling of DGs (CoP). It is the CoP which calls up over 50 Australian Standards which are in effect a default set of storage design criteria. Compliance with the Australian Standards are not always met and I have seen many sites in non-compliance.

Training on DG is also required. Yes you need a DG training certificate to get a DG transport licence, but also all employees handling DGs on site also require storage and handling training, refreshed every 5-years. ASBG has been delivering public and in-house DG training for over 10 years (see www.asbg.net.au).

Overall waste management does come across DGs regularly and there is a need to know your DGs better for its classification, transport and storage. Such knowledge can also be used to assist clients in the compliance issues which are a big part of the service provided by the waste industry.