

Storage of Refuse Derived Fuel (RDF) / Solid Recovered Fuel (SRF)

Purpose

To provide clarification on the licensing requirements associated with the storage of refuse-derived fuel (RDF) or solid recovered fuel / specified recovered fuel (SRF).

Background

Refuse-derived fuel (RDF) or solid recovered fuel / specified recovered fuel (SRF) is a fuel produced from residual solid waste. However, SRF can be distinguished from RDF in that it is produced to reach a standard such as CEN/343 ANAS.

Manufacture of RDF/SRF is regulated under the Pollution Prevention and Control (PPC) regime when the site has capacity to produce more than 75 tonnes per day. RDF/SRF manufacturing sites with a capacity of less than 75 tonnes per day will require a waste management licence.

Only waste which conforms to the classification EWC 19 12 10 - Combustible Waste - Refuse Derived Fuel should be classed as RDF/SRF and stored in accordance with this Guidance. The waste has to meet the calorific, moisture content and other properties specified by the receiving EfW facility. Wastes which require further processing (sorting or separation) prior to incineration such as 19 12 12 (other wastes from mechanical treatment) cannot be classed as RDF/SRF.

Regulatory position for storage of RDF/SRF at dockside for up to 5 days

The Scottish Environment Protection Agency (SEPA) will allow the storage of RDF / SRF for up to 5 days at the immediate dockside pending its loading for export, without the need for a waste authorisation provided that SEPA is satisfied that the operator meets the following requirements:

- The dockside must be cleared of all waste 5 days after the initial deposit of RDF/SRF.
- The total amount of RDF/SRF stored at any one time does not exceed 4,000 tonnes.
- The RDF/SRF must be stored in a secure place.
- RDF/SRF must be stored in bales wrapped to sufficient standard that prevents the ingress of water, access by pests, odour release or escape of waste material. Bales must be inspected regularly to identify any damage which must be repaired within 24 hours

Otherwise SEPA may consider the waste to be illegally deposited or stored and there is the risk of potential enforcement action.

For the purposes of this Position Statement, a “dockside” is an area adjacent to where the ship is or will be docked.

Storage requirements for RDF/SRF awaiting export (exceeding 5 days)

Storage of Refuse-derived fuel (RDF) or solid recovered fuel (SRF) in Scotland requires a waste management licence under the Environmental Protection Act 1990 unless it is covered by an exemption such as a paragraph 40 exemption for the secure storage of non-liquid waste other than at the place of production. However the exemption only applies if, among other things, the amount of non-liquid waste stored does not exceed 50 cubic metres. Baled RDF/SRF is commonly stored in larger quantities than this while it is being bulked up prior to movement.

RDF/SRF can vary considerably in composition and physical characteristics and as a result there is a need to ensure that the controls placed upon its storage are sufficient to minimise environmental risks. The guidance below sets out SEPA's expectations on how RDF/SRF should be stored in order to prevent environmental nuisance or harm.

1. All RDF/SRF should be stored in bales wrapped to sufficient standard that prevents the ingress of water, access by pests, odour release or escape of waste material. Bales should be inspected regularly to identify any damage which should be repaired within 24 hours.
2. If repair of damaged bale wrap is not possible on site, the waste should be removed within 24 hours to a suitable licensed facility for further treatment or disposal.
3. RDF/SRF should be stored inside a building on an impermeable surface or, when stored outside, RDF/SRF should be located on an impermeable surface with a sealed drainage system.

Sealed drainage systems must direct all leachate and water to a sealed sump, the public sewer via an oil interceptor or consented discharge to a watercourse or soakaway via a full retention class A interceptor.

Note: In exceptional circumstances where there are no sensitive receptors this requirement may be reduced provided applicants/Licence Holders can demonstrate that alternative controls shall be in place to protect the environment.

4. The Licence Holder should take all necessary measures to prevent access by birds, insects or other vermin to the RDF/SRF.
5. No RDF/ SRF should be stored on site for longer than 3 months.

If the RDF/SRF has previously been stored for several weeks at another location before arriving on the site the storage time at the site should be reduced accordingly.

6. A written system should be in place for RDF/SRF storage to ensure that a strict rotation exists so that the oldest waste is removed from site first. This system shall include marking of each bale with its date of final processing before storage and clear spatial separation of RDF/SRF of different storage ages.
7. A written system should be in place to prevent, detect, contain and mitigate fires. Sufficient access for Fire and Rescue Service and other emergency vehicles should be maintained at all times.

Note: This shall apply to the whole site if RDF/SRF production is co-located with other waste management activities.

This position and guidance applies only in Scotland. The terms of this position may be subject to periodical review and be changed or withdrawn in light of technological, regulatory or legislative changes, future government guidance or experience of its use. SEPA reserves its discretion to depart from the position outlined here and to take appropriate action to avoid any risk of pollution or harm to human health or the environment.