

Practical considerations and outline process considerations for household waste recycling centre (HWRC) reopening during COVID-19 restrictions

As Defra and central government develop their thinking and further guidance with regard to the potential reopening of HWRCs, SUEZ recycling and recovery UK has prepared this second guidance document as a complement to our earlier document, *What does COVID-19 mean for household waste recycling centre (HWRC) operations?*, which was published early in April 2020. This second document seeks to establish a logical process by which the need to reopen, and some of the practical operational considerations for making those sites that do open safe to operate and attend, are addressed.

SUEZ continues to work with government, regulatory agencies, trade associations, employees and customers in seeking to ensure that during the pandemic and in the phased recovery expected, it continues to maintain critical essential services and keep its employees, customers and members of the public safe.

April 2020



Key principles related to reopening a household waste recycling centre

In our previously published document¹, we set out the legal basis of reopening together with considerations on maintaining social distancing on site and managing traffic off site. It's important that all of those involved in the decision making and assessment of reopening HWRC sites clearly understand the key principles under which they are working.

These are set out below:

- 1** It is lawful for an HWRC to be opened.
- 2** It is lawful for the staff of the HWRC to attend the site for the purposes of work.
- 3** It is not unlawful for a member of the public to attend the HWRC if their trip is essential and they are making use of a critical public service.
- 4** It is likely to be unlawful for the public to attend the HWRC if their trip is:
 - a.** Not essential.
 - b.** If more than two adults attend the site, unless for a reason related to moving to a new house.
- 5** For an operator to open an HWRC, it will need to have undertaken necessary assessments and works to ensure that staff and visitors can, whilst on the site, be kept safe and respect the social distancing requirements as outlined by UK government.

¹ <https://www.suez.co.uk/-/media/suez-uk/files/publication/covid19andhwrcoperations202048-3s.pdf>

Principles and process to be applied for potentially opening an HWRC

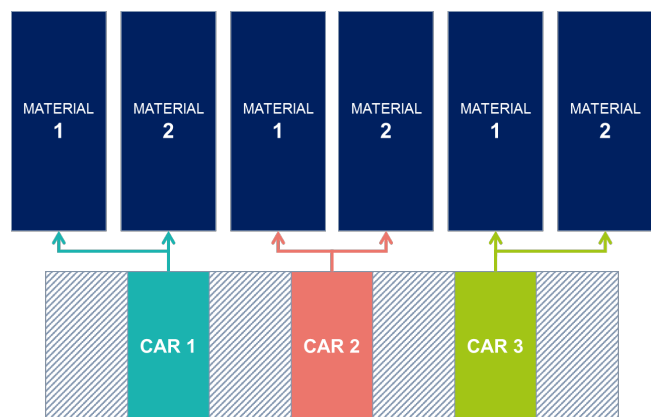
- 1 **Client** – must make a formal request to reopen an HWRC site(s).
- 2 **Consideration of opening** – upon a request being made the operator should:
 - a. **Assess each site individually as to its acceptability** to be opened, including factors that assist in understanding if the site can be operated safely in accordance with the social distancing rules and operating conditions pertaining at the time. For instance:
 - ▶ Is the site shared with another operation (a transfer station, for instance) and would suffer from traffic congestion outside the site?
 - ▶ Is the site configured in a manner that means it is not possible or practicable to maintain safe distancing for staff and visitors?
 - ▶ What needs to be considered in terms of traffic management and flow.

Only sites deemed safe to operate should be considered for opening.

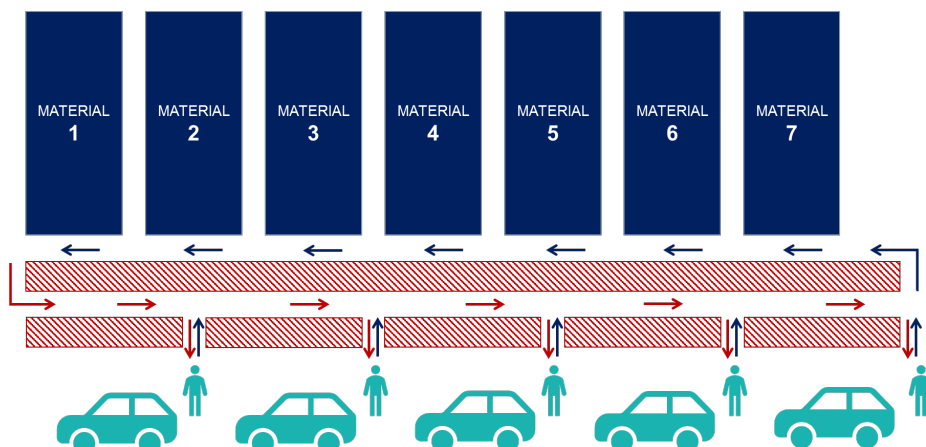
- b. **Assess the vehicle capacity of the site** with the new operating conditions, such as every second parking bay closed. **This will establish the onsite vehicle limit.**

- c. **Review the bin/container arrangements** related to the vehicle parking layout to calculate how many containers can be safely accessed by visitors from their parking location. **This will define the number of individual waste streams that can safely be accepted at the site.**

Example arrangement ←



→ Example arrangement



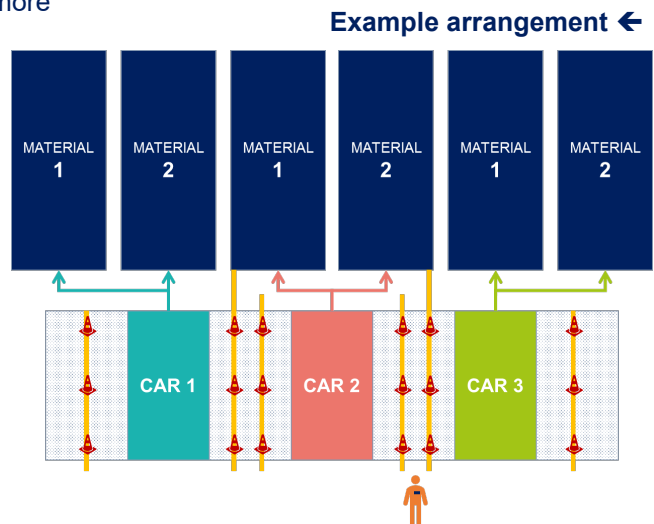
- d. **Assess the types of waste streams that could be accepted** at the site and be removed to appropriate treatment facilities / end markets. There is little point opening an HWRC to accept a waste stream where the onward treatment locations are closed or unable to accept the waste streams you are collecting. **This work will help establish the range of waste streams that could technically be accepted at a site.**

The client should determine which wastes it thinks are essential to be brought to an HWRC and prioritise these in consultation with the operator, such that those chosen meet the site and treatment constraints.

- e. **Determine, based on the design of the safe traffic and visitor movement arrangements within the site, how many staff will be needed on the site to ensure service and safe management.**

As a suggested guide, it may be difficult for more than one site staff member to manage more than three vehicles at any one time.

Zones will require traffic cones and tape markings like those shown in the example here. For this example, reverse-parking-only protocols would apply together with vehicle size limits and no trailers also being applied. Employees would stay at the front of the cars or pass down the marked intermediate lanes to engage with visitors at the rear of their cars.



- f. **Determine how many staff are required to manage access to the site and maintain social distancing whilst doing so.** It is highly likely that the site will require a staff member at the entrance to control access. If the 'gate keeper' can see the parking bays, then they should be sufficient to manage access (only allowing cars to enter the site when a parking bay is free). If the 'gate keeper' is unable to see all the parking bays, then it may be necessary to have a 'controller' at a position where they can see all parking bays and can relay messages to the 'gate keeper'. The site entrance may need temporary configuration changes to ensure the 'gate keeper' can maintain social distancing from the vehicle driver.

No site can be considered for opening if there are not enough trained staff available.

- g.** Design new operating procedures and undertake new or additional health and safety considerations or reviews, these should include:
- ▶ The risks to staff.
 - ▶ The risks to visitors.
 - ▶ Necessary PPE for staff in each of the defined roles.
 - ▶ Necessary PPE or sanitary controls for areas accessed by visitors.
 - ▶ Access to sufficient PPE stocks and supplies to ensure that operations can commence and be maintained for the periods of operating proposed.
 - ▶ Allow for temporary stoppages of access to the site to accommodate personal hygiene or to disinfect areas of the site.
 - ▶ Apply or maintain a vehicular-access-only rule to the site.
 - ▶ Prevent anyone exhibiting symptoms of the virus from accessing the site.
 - ▶ Communicate a one-person-per-car rule and discourage children from accompanying them on the trip. However, if these are unavoidable, then only one other adult should be permitted and all children should remain in the vehicle at all times.
 - ▶ When reopening sites, an additional duty of regular cleaning and disinfection of handrails and other communal touch points should be established.

No site can be considered for opening if there is insufficient PPE and washing/sanitary equipment available.

Non-compliance

If during the operation of the HWRC it is not possible to maintain appropriate health and safety measures or social distancing, then the site should be temporarily shut and the procedures and systems reviewed.

For deliberate failure to comply with social distancing or essential waste requirements, a member of the public should be asked to leave the site. Persistent attendance and failure to comply should be reported to the police.

Off-site matters

In considering opening a site, it's important to assess what issues might occur outside the site. The following should be considered:

- ▶ Does the site normally have queues outside the site during:
 - Normal times?
 - Bank holidays or other distinct periods of time?

If yes, or if it is considered that queues will develop outside of the site, then discussions with council highway officers and the local police should occur to agree methods and procedures for traffic management.

- ▶ Considerations for off-site traffic if a queue of traffic should develop would include:
 - Prevent safe access to the site by servicing vehicles.
 - Prevent safe access to the site for vehicles using other facilities at the site.
 - Prevent neighbours undertaking their essential trips.
 - Prevent other traffic undertaking their essential journeys.
 - Prevent emergency services attending the site.
 - Prevent emergency services attending incidents elsewhere.

An HWRC should only be reopened if the police consider it is safe to do so.

- ▶ Limiting demand should be considered through:
 - Reviewing specific opening times to seek to manage demand and servicing of the site by the removal vehicles.
 - Limiting items that are allowed to be brought to the site and clearly communicating them to the public well in advance of site opening.
 - Potentially limiting access to parts of the local community on particular days. For instance, access being linked to normal bin collection days (each household has access on the day its bins are normally collected only).
 - Limiting queuing traffic and providing information to householders on busy periods or queue time lengths by signs on the kerbside, by messages on websites and by social media and possibly by access to site-based webcams.
 - Establishing a pre-booking system where the public book a time and date slot at a particular site.
- ▶ Good communications with the public are paramount to ensure only essential waste is brought to the site and that rules and expectations on site and on approaching the site are clearly established and understood.

Consideration on what wastes might be considered 'essential wastes' and what may not

In considering reopening an HWRC, one of the most important matters is what wastes need to be brought to the site, as only essential ones should justify leaving the safety of the home. If householders can temporarily store their waste in a manner that does not pose a risk to their safety, then they should do so. In considering what should be defined as an essential waste, the following is a guide:

- 1** Residual wastes are essential wastes where the kerbside collection is suspended, or the service is unable to accommodate this waste in the kerbside collection of residual waste. Only wastes normally placed in the residual bin or directed specifically to be placed in the residual bin by the local authority should be disposed of in this way.
- 2** Food wastes are an essential waste where the kerbside collection is suspended or where its inclusion in residual waste collections means that there is insufficient bin capacity available.
- 3** Clinical hygiene wastes are essential wastes where they are not allowed or cannot be accommodated in the residual waste bin (for COVID-19 materials, this should mean double-bagged and held out of the bin for 72 hours and not brought to the site until after this time).
- 4** Physical wastes are essential wastes if being left at the home poses a risk to human health by their nature or the nature of their degradation products (such as asbestos).
- 5** Chemical wastes are essential wastes where they cannot be stored in their original safe containers and which pose a risk to human health by storage at home.
- 6** Wastes arising from home DIY are essential wastes when the works were necessary:
 - a.** To prevent pipe leakage and house damage.
 - b.** To make the property electrically safe.
 - c.** To repair the system of heating the house.
 - d.** To keep the building weather proof.
 - e.** To keep the building secure.

Waste arising from any contractors working on homes should be removed by the contractor using a licenced waste contractor and permitted waste treatment facilities.
- 7** Bulky wastes are unlikely to be essential wastes, especially where bulky waste kerbside collections are ongoing or can be reinstated.
- 8** Unnecessary DIY activity waste is unlikely to be essential waste.

- 9 Dry recycling waste is unlikely to be essential waste.
- 10 Garden waste is unlikely to be essential waste.
- 11 Animal waste should be placed in the residual waste and is unlikely to be an essential waste.
- 12 Waste electronic equipment is unlikely to be an essential waste.
- 13 Exhausted batteries (car or small) are unlikely to be an essential waste.
- 14 Waste textiles are unlikely to be an essential waste.

Where a householder does have essential waste which justifies a trip to an HWRC, if they can bring other non-essential wastes with them that the HWRC site is accepting, then there may be benefits to considering including these additional materials. Care should be taken to understand the throughput efficiency impacts that these additional wastes might have on the site to ensure that the purpose of opening the HWRC for essential wastes is not impaired.

HWRC sites and the services they offer to the public are often determined at a site-by-site level. As such, the approach, guidance and suggestions included in this document are designed to inform the thinking that would be needed and not to predetermine the site-specific assessment outcomes. SUEZ does consider that a consistent and detailed consideration of the approach to HWRC reopening is fundamental and we hope that readers find the details included useful.

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