

Agenda

Auto-dismantlers scrap metal working group

Purpose and overview

(Convener) (10 minutes)

During consultation on the proposed minimum environmental standards for scrap metal facilities common concerns were raised by stakeholders. The EPA has convened this working group to discuss these concerns and explore changes to the proposed standards.

Items for discussion

- 1. Standard one and three: requirements for hardstands and under-cover areas and requirement to drain fuel and other liquids prior to processing and storage of end-of-life vehicles.
- 2. Standard two: requirement for water management infrastructure.
- 3. Standard five: requirement for scrap metal sent for processing to be free of other waste.

1. Item: Standard One and Three

(All) (35 minutes)

Elements of standard one for discussion:

All end-of-life vehicles, white goods, and other scrap metal must be stored and dismantled/processed on hardstands under-covered areas with appropriate drainage infrastructure.

- Ensure that end-of-life vehicles and white goods are not stored on porous surfaces or near drains, as this could enable harmful liquids to reach soil and waters.
- Ensure work areas drain inward to a collection system and not to stormwater and other areas of the site.
- Ensure scrap metal is always placed on hardstands made of a resistant and waterproof material, such as concrete, during storage and processing. This will help retain any liquids and avoid spillages.

Elements of standard three for discussion:

 Fuel and other liquids must be drained prior to any processing or storage of end-of-life vehicles.

Issues raised during consultation:

- Submissions raised concerns that installing hardstands and roofing over entire sites
 where scrap metal is stored and processed would be operationally impractical and
 cost prohibitive.
- Submissions recommended that instead of installing roofing and hardstands over entire sites that vehicles be decommissioned in a covered area on a hardstand within 21 days of the vehicle arriving at the facility.
- Submissions also recommended that decommissioning should involve removal of gases, coolants, oils and contaminants before any further processing (including bailing



and milling) to reduce the risk of harmful liquids coming into contact with soil and waters.

Items for discussion:

- Alternative infrastructure or revised location and size of hardstands and under-cover areas to achieve similar environmental outcomes.
- Proposal to depollute vehicles within 21 days of the vehicle arriving on site, including removal of gases, liquids and other contaminants, prior to any processing.

2. Item: Standard Two

(All) (20 minutes)

Elements of standard two for discussion:

- Clean and dirty water systems and areas must be separated (including bunding to separate them), and all dirty water is to be contained and treated on site.
- Appropriate drainage must be in place on site to collect surface water run-off.

Issues raised during consultation:

- Submissions raised concerns that retrofitting sites to install water management systems as currently laid out in the standard could be cost prohibitive and operationally impractical.
- Several submissions saw the installation of bunding as a key concern because it could hinder the movement of machinery around a facility.
- Submissions proposed that only areas where vehicles are dismantled, degreased, washed or where parts are cleaned are treated as dirty water areas.
- Submissions requested the inclusion of oil separators in water management infrastructure.

Items for discussion:

Alternative infrastructure design to manage water on site.

3. Item: Standard Five

(All) (20 minutes)

Elements of standard five for discussion:

- End-of-life vehicles, white goods, and other scrap metal sent to a hammermill and/or shredder or for other processing either on site or off site must be free of other waste (including waste tyres).
- To prevent unnecessary contamination and an increase in shredder floc, end-of-life vehicles, white goods, and other scrap metal sent to a hammermill and/or shredder or for other processing either on site or off site must be free of other waste, that is, those wastes that are not part of the original vehicle or appliance.

Issues raised during consultation:

Submissions advocated that tyres should be considered part of the original vehicle.

Items for discussion:

Consideration of tyres as part of the original vehicle.



4. Item: Wrap up and next steps

(Convener) (5 minutes)