

Our ref: LRWP362 & 405  
Your ref:  
Date: 29 February 2016

Dear Sir,

### **Removal of Regulatory Position Statements for Treatment of Catalytic Converters**

We are writing to you as your website indicates that you buy catalytic converters that have been removed from motor vehicles.

We recently became aware that the support mat contained within some catalytic converters contains refractory ceramic fibre (RCF). RCF is classified as a Category 1B carcinogen and has properties very similar to asbestos. This means that catalytic converters containing an RCF mat must be classed as hazardous waste. Further information about classifying and handling hazardous waste can be found at: <https://www.gov.uk/dispose-hazardous-waste/overview>

For your own wellbeing if you were not already aware of the RCF matting being classed as a carcinogen we would recommend that you review your procedures in light of this information. We would also welcome and information or procedures you have in place that you use to identify catalytic converters containing RCF matting prior to the decanning process.

#### **Low risk Positions**

We currently have two low risk waste positions (LRWP 362 & LRWP 405) which can be found at <https://www.gov.uk/government/publications/low-risk-waste-activities-guidance>. These low risk positions allow the storage, sorting and dismantling of motor vehicle catalytic converters. We are withdrawing these positions given the environmental and health risks associated with handling RCF. To allow you time to apply for the appropriate environmental permit or cease processing catalytic converters we are allowing a **3 month transitional period till 30 May 2016** before we withdraw them.

Further details on how to apply for an environmental permit can be found at: <https://www.gov.uk/environmental-permit-how-to-apply/overview> or contact your local Environment Agency Office to discuss your application enquiries@environment-agency.gov.uk or call our enquiry line 03708 506 506.

#### **Classification of catalytic converters**

Classification of catalytic converters under Commission Decision 2014/955/EU on the list of waste is as follows:



- Catalytic converters with RCF matting should be classified as hazardous waste. List of Waste code 16 01 21\* hazardous components other than those mentioned in 16 01 07 to 16 01 11 and 16 01 13 and 16 01 14.
- Where a catalytic converter is removed from a vehicle and it is not possible to determine if it has RCF matting it must be classed as 16 01 21\*.
- Catalytic converters that do not have an RCF mat within them should be coded 16 01 22 – components not otherwise specified.

The process of 'de-canning' and removing the catalyst in catalytic converters containing RCF matting is a hazardous waste treatment process. This process must be carried out using equipment that is suitably extracted and abated with local exhaust ventilation (LEV) fitted with a HEPA filter (<http://www.hse.gov.uk/lev/>). We are currently producing further guidance and will forward a copy to you for your comments.

- The RCF mat once removed from the metal casing and catalyst will remain hazardous waste (16 01 21\*) and must be appropriately packaged and then consigned for disposal at a suitably permitted site.
- If RCF is left within the metal casing it remains a hazardous waste (16 01 21\*) and must be appropriately packaged and consigned for disposal at a suitably permitted site. Metal casing with RCF matting in it must not be sent for crushing or shredding unless that shredder is authorised and abated.
- A metal casing that has had all of the RCF removed can be classed as non-hazardous waste (16 01 22).

Yours faithfully,

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