

From: Paul Tubbs
Sent: Thursday, 9 May 2019 1:44 PM
To: ATRI-625-WasteData
Subject: RE: PowerPoints from yesterday's workshop - liable recyclers

Hello

Thank you to DWER for providing the opportunity for industry stakeholders to be involved in the amendment of WARR regulations.

My comments on the following slide.

Slide 7 Material Categories

This comment is relevant to the Stoneridge business group, as there was no other business represented similar to us I have addressed this email to you only. Stoneridge operations is not a waste transfer station

Stoneridge holds the following EPA Prescribed Premises

Category 13: Crushing of building material: premises on which waste building or demolition material (for example, bricks stone or concrete) is crushed or cleaned.

100,000 tonnes per annual period

Category 61A :Solid waste facility: premises (other than premises within category 67A) on which solid waste produced on other premises is stored, reprocessed, treated, or discharged onto land.

200,000 tonnes per annual period.

Stoneridge accepts high density construction and demolition waste materials, however we specify that we do not accept timber other organics, plastic and paper.

This allows us to process incoming waste with minimal sorting. The waste is not 100% free of the mentioned contaminants (timber other organics, plastic and paper) what we remove is placed in a waste bin and collected.

- In regards to Material Categories, I think it would be advisable to include a category as “ Construction/Demolition Waste (CDW).
- Its Bulk Density is approximately 1.4 t/m³ , which would account for air voids due to variable particle dimensions in any given load.

The category would include concrete, masonry, aggregate, sand.

I see that you have these materials separated in your current categories, our business does not need to separate the individual streams as they need to be combined for us to able to re-use in our process.

The cost of sorting and combining again is a cost the industry cannot absorb, it would mean the demise of our recycling product and business.

Regards

Paul Tubbs
Group Operations Manager

