

LIT 7753 The re-use of end of life fire extinguishers for training purposes and their dismantling for the purpose of recovery

If you comply with the requirements set out below, we will allow end of life fire extinguishers to be re-used for training purposes and the emptying of the contents from, and the dismantling of, end of life fire extinguishers for the purpose of recovery, without an environmental permit.

Background

Fire extinguishers typically have a life span of 5-15 years. Regular maintenance and replacement of extinguishers is required and companies supplying and maintaining fire extinguishers often need to empty the contents of some types of end of life extinguishers in order to make them safe to transport and to carry out some dismantling to allow the component parts to be recycled. In addition, some end of life extinguishers can be useful equipment for staff training purposes.

Paragraphs T9 and T12 of Schedule 3 to The Environmental Permitting (England and Wales) Regulations 2010 (as amended) (EPR) exempt the recovery of scrap metals (T9) and the manual treatment of waste (T12) for the purpose of recovery but neither specifically includes end of waste fire extinguishers as one of the waste types that can be treated. An environmental permit is therefore required for the treatment of end of life fire extinguishers.

Similarly, Paragraph U8 exempts the use of waste for a specified purpose. It does not include the use of end of life fire extinguishers for the purpose of training people in fire safety. An environmental permit is required for this operation.

Our approach

Treatment for the purpose of recovery

We will not pursue an application for an environmental permit for the activity where:

- The total quantity of end of life fire extinguishers (16 05 05) stored at any one time does not exceed 4,000 extinguishers.
- The total quantity of end of life fire extinguishers (16 05 05) treated does not exceed 1,000 extinguishers per month.
- No fire extinguishers containing halons are treated.
- No waste is stored for longer than 12 months.
- All storage and treatment is carried out at a secure location and on impermeable pavement with sealed drainage.
- Treatment is limited to the discharge of the contents of the extinguishers and dismantling by removal of valves and other parts from cylinders to allow recycling of the metals, plastic and rubber under exemptions or environmental permits at either the same location or elsewhere.
- The contents of water and foam extinguishers is discharged either to;
 - foul sewer under a relevant trade effluent discharge consent issued by the water company / sewerage undertaker, or
 - to a sealed tank/container for disposal/recovery elsewhere at an appropriately authorised waste treatment facility

- The contents of dry powder extinguishers are emptied into a suitable sealed container or containers. Different types of powder are stored separately and are kept dry.
- The contents of carbon dioxide extinguishers are discharged to air outside.
- You meet the relevant objectives of the Waste Framework Directive;
 - '... ensuring that waste management is carried out without endangering human health, without harming the environment and in particular:
 - (i) without risk to water, air, soil, plants or animals;
 - (ii) without causing a nuisance through noise or odours; and
 - (iii) without adversely affecting the countryside or places of special interest.'

Use of end of life fire extinguishers for the purpose of training

We will not pursue an application for an environmental permit where:

- Only end of life water or carbon dioxide fire extinguishers (16 05 05) are used.
- The use is for training purposes only.
- The total quantity of extinguishers used or stored at any one time does not exceed 100.
- The waste is not treated or required to be treated prior to use.
- You meet the relevant objectives of the Waste Framework Directive;
 - '... ensuring that waste management is carried out without endangering human health, without harming the environment and in particular:
 - (i) without risk to water, air, soil, plants or animals;
 - (ii) without causing a nuisance through noise or odours; and
 - (iii) without adversely affecting the countryside or places of special interest.'

Enforcement

- In not pursuing an application for a permit, we will not normally take enforcement action unless the activity has caused, or is likely to cause, pollution or harm to health. For a more detailed explanation of this enforcement position, please see our [Enforcement and Sanctions](#) statement.
- This statement is based on our understanding of the relevant legislation. It applies to England only. You can get advice on the approach being taken in Wales from [Natural Resources Wales](#).
- This regulatory position will be reviewed by May 2018.

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