CODE OF PRACTICE ON THE HANDLING, TRANSPORTATION AND DISPOSAL OF ASBESTOS WASTE

(Published under the Waste Disposal Ordinance (Cap.354) Section 35)

Environmental Protection Department
Hong Kong
Asbestos is a material that has been used for many years in the construction, manufacturing, services and shipping industries. It is a hazardous material and appropriate care must be taken in handling any material which contains asbestos. Asbestos waste is classifiable as chemical waste under the Waste Disposal (Chemical Waste) (General) Regulation and its handling, collection, transportation and disposal is controlled by the legislation. This code gives guidance to persons who may come into contact with asbestos waste on the safe handling of asbestos waste and how they can comply with the legislative controls.

This Code of Practice is a statutory document. It was first published in January 1993 by the Secretary for Planning, Environment and Lands under Section 35 of the Waste Disposal Ordinance after consultation with the Environmental Pollution Advisory Committee. The purpose of this Code is to provide guidance and advice on the collection, storage, treatment, transportation and disposal of waste. It is not legally binding, but compliance with the Code could be employed as evidence of good practice in the course of a legal defence.

Enquiries concerning the Code of Practice may be addressed to the Environmental Protection Department at:

Address

Environmental Protection Department
28/F, Southorn Centre
130 Hennessy Road, Wanchai, Hong Kong.

Telephone : 2838 3111
E-mail : enquiry@epd.gov.hk
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1. LEGISLATIVE CONTROLS

- Under the Waste Disposal (Chemical Waste) (General) Regulation (the Regulation) made under the Waste Disposal Ordinance (Laws of Hong Kong Chapter 354), asbestos waste is classified as a chemical waste. The legislative controls include controls on the packaging, labelling, storage, collection and disposal of chemical wastes. This Code of Practice provides guidance to any person who may be involved in the handling, packaging, transportation and disposal of asbestos waste and on how they can comply with the legislation. More details of the above legislation can be found in A Guide to the Chemical Waste Control Scheme published by the Environmental Protection Department (EPD) (address shown in the Preface).

- A separate code of practice, published by the Labour Department, and entitled Control of Asbestos at Work, covers the protection of the health and safety of workers handling asbestos or involved in the production of asbestos waste. This should also be complied with. Specific requirements are also laid down on the distribution of asbestos waste under the Factories and Industrial Undertakings (Asbestos) Special Regulations 1986 and these requirements should be followed. The Notice to Shipowner, Shipbuilders, Ship Repairers and Shipbreakers issued by the Marine Department also provides advice on the health hazards of asbestos and the precautions to be taken during demolition or repair work aboard ships and floating structures.

2. FORMS OF ASBESTOS

- Asbestos is a mineral which, both in its raw form and as a constituent of composite materials, has many uses in the construction, manufacturing, services and shipping industries. It occurs in three main forms-
  - Crocidolite or blue asbestos - widely used at one time for insulation especially where chemical resistance is required.
  - Amosite or brown asbestos - used mainly in bonded asbestos products.
  - Chrysotile or white asbestos - now used for most applications.

- There are other, much less common forms, which may be encountered occasionally. Concern over health risks has led to asbestos being replaced by safer substitutes in many products. Practically all asbestos now used in Hong Kong is chrysotile, though blue and brown asbestos will continue to be produced as waste for many years from the stripping of old insulation and lagging.

3. TYPES OF WASTE

- For the purposes of this Code of Practice asbestos wastes are classified as follows -

  **Type 1**

  Bonded asbestos wastes (other than blue or brown asbestos) in good condition, and free from any material likely to release asbestos fibres. Examples of bonded asbestos materials are: asbestos cement sheets, pipes and other fittings; asbestos reinforced plastics; asbestos reinforced jointings, packings and gaskets. Any friable or crumbly material containing asbestos reinforcement, or any dust from sawing, drilling and machining bonded asbestos products are Type 2 waste.

  **Type 2**

  Any waste containing loose asbestos fibres (other than blue or brown asbestos); for example asbestos lagging, asbestos wall and ceiling insulation; asbestos wool and textile products; dust from sawing, drilling and machining bonded asbestos products; friable asbestos cement products; loose asbestos diaphragms from chloralkali cells; asbestos-containing sludges; empty sacks, bags or
drums that have contained loose asbestos fibre; floor sweepings from any operation involving asbestos dust or powder.

**Type 3**

All blue asbestos (crocidolite) and brown asbestos (amosite), whether in good condition or not, or any articles contaminated by blue or brown asbestos.

### 3.1 Mixed Asbestos Wastes

- The three types of asbestos waste should normally be kept separate from each other, and from other waste. In some circumstances this can be difficult, for example where intact bonded asbestos is mixed with sawdust and friable materials. In such cases, EPD as the authority under the Regulation may allow mixed loads to be delivered to the disposal sites. These loads will be subject to special conditions, the general nature of which are found in section 8 below, though further conditions may be placed on particular loads at the discretion of EPD.

- Unlike many other hazardous wastes, asbestos cannot be readily detoxified or rendered harmless by waste treatment processes (Note 1). Many of the waste handling and treatment operations used in Hong Kong will have the effect of breaking up asbestos waste and releasing fibres into the atmosphere, thereby endangering employees and the general public. Thus asbestos waste must never be mixed with household or commercial wastes, nor delivered to incinerators, refuse collection points, transfer stations or public dumping area and reclamations.

Note 1: Several processes to detoxify asbestos are being developed. Asbestos vitrification is a new process developed in the UK and has been marketed worldwide.

### 3.2 Identification of Asbestos Waste

- The positive identification of asbestos fibres requires specialist laboratory techniques. Asbestos waste produced by industrial processes is readily identified from the raw materials used, but in the case of many construction and demolition operations (involving for instance the stripping of lagging or other forms of insulation) the waste may contain either asbestos or other fibrous materials. Even where asbestos is known to be present, exposure to heat can change the characteristic blue-grey colour of crocidolite to a dirty, white colour, which may be confused with the less hazardous forms.

- Waste which may contain asbestos should be treated as hazardous unless and until laboratory tests prove its absence. In the case of small amounts of waste it is more practicable to dispose of it as if it were asbestos rather than to undertake laboratory testing to determine the actual constituents. For larger quantities (above 5m³ in bulk or 100m² for sheets) samples of the waste should be taken and tested in the laboratory for asbestos. These samples should be taken before work begins in the case of demolition work and insulation stripping. Information on laboratories accredited to undertake asbestos determinations may be obtained from the Air Management Group of EPD (address shown in Appendix A).

### 4. REGISTRATION OF WASTE PRODUCERS

- Under the Regulation, producers of chemical waste including asbestos waste are required to register with EPD before engaging in any activity which produces such waste. Any producer who fails to comply with the registration requirements commits an offence. For more details, please refer to A Guide to the Registration of Chemical Waste Producers published by EPD. Copies of the Guide and registration forms can be obtained from EPD.

### 5. LICENSING OF WASTE COLLECTORS

- Under Section 10 of the Waste Disposal Ordinance, collectors who collect and transport asbestos waste to an off-site facility for disposal have to be licensed by EPD. Any waste producer who wishes to transport his own waste also has to be licensed. Details on the licensing requirements and the application procedures can be obtained from EPD.
6. PACKAGING, LABELLING AND HANDLING OF ASBESTOS WASTE

6.1 Type 1 Waste

- Type 1 waste (bonded asbestos products free from dust, and in good condition) shall be packed with 2 individual layers of strong transparent plastic sheets of not less than 0.15 mm thickness and completely sealed with adhesive tapes. Type 1 waste shall be packed in suitable sizes for easy handling. The height of each package shall not exceed 750 mm. On no account should Type 1 waste be mixed with domestic or commercial wastes for disposal. The inner sheet should be clearly labelled as illustrated in Appendix B. The dimensions of the label should not be less than 120 mm x 150 mm.

6.2 Type 2 Waste

- Type 2 waste contains loose asbestos fibres which are potentially hazardous to workers handling the waste, and to the general public if the waste is allowed to disperse into the air, even in very small quantities.

- All Type 2 waste must be contained, as soon as it is produced, in strong bags made from plastic or other containers approved by EPD (Details in Appendix B). The bags should be goose-neck sealed by means of adhesive tapes. A bag filled with asbestos waste should be placed inside another plastic bag to provide additional protection. The colour of the inner bag should be white while the outer bag should be transparent to facilitate visual inspection. The inner bags of the Type 2 waste should be clearly labelled as illustrated in Appendix B. Vacuum packing of asbestos waste should be carried out wherever possible such that air is excluded from the bags as far as possible before sealing.

- All articles contaminated with Type 2 waste (gloves, breathing masks, etc.) should also be contained in bags for disposal. Type 2 waste packed in bags should be kept apart from other waste, and must on no account be mixed with non-asbestos waste since the bags could easily be split, releasing asbestos fibres to the environment.

6.3 Type 3 Waste

- Type 3 waste (blue or brown asbestos) is hazardous in very small quantities. Great care must be taken to prevent release of any blue or brown asbestos waste. The handling of Type 3 waste should be similar to that of Type 2 as mentioned in section 6.2 except that the colour of the inner bags should be orange and clearly labelled as illustrated in Appendix B.

6.4 Presence of Sharp Objects

- The presence of sharp objects could easily damage the plastic packaging when plastic sheets or bags are used for packaging asbestos waste. This should be avoided by wrapping the sharp ends with strong plastic sheets of 0.15 mm thickness and completely sealed with adhesive tapes. Alternatively, the waste should be placed inside a sealed metal drum to avoid any possible release of asbestos fibres (Details in Appendix B).

6.5 Bulky Asbestos Waste

- Bulky asbestos waste which cannot be suitably contained in plastic bags or drums should be wrapped with 2 individual layers of strong plastic sheets of not less than 0.15 mm thickness and completely sealed with adhesive tapes. For Type 1 waste, two layers of transparent plastic sheets should be used. The colour of the inner plastic sheets should be white for Type 2 and orange for Type 3, while the outer plastic sheets should be transparent for both types of waste. The inner sheet must bear the appropriate markings as mentioned in sections 6.1-6.3. Since the packages would be disposed of into pre-excavated trenches, the maximum size of the packages should be restricted to 3000 mm(L) x 1500 mm(W) x 750 mm(H).

- The external surface of all containers and bags must be thoroughly cleaned by wet wiping or vacuuming using specialized equipment in a controlled environment to achieve a condition of no visible debris or fibres.
6.6 Loading and Unloading

Asbestos waste should be loaded and unloaded by hand or mechanical crane as appropriate. Bags should not be thrown or dropped into the pre-excavated trenches. Approved face masks as specified in the Factories and Industrial Undertakings (Asbestos) (Approval of Respiratory Protective Equipment) Notice 1986, appropriate heavy duty rubber gloves, overalls and working shoes should be worn during the handling of asbestos waste.

7. STORAGE OF ASBESTOS WASTE

If special arrangements have to be made at the disposal site for large arisings of asbestos waste, then waste producers will need to make provisions for the temporary storage of the waste. All storage of asbestos waste should be carried out properly in a secure place isolated from other substances so as to prevent any possible release of asbestos fibres into the atmosphere and contamination of other substances. Type 1 waste should not be stored together with Types 2 and 3 waste so as to avoid damage to the plastic bags of Type 2 or 3 waste, unless the bags are packed in boxes or drums for additional protection. Bagged asbestos waste should not be stacked more than 3 bags high in order to avoid damage to the bottom bag. The storage area should be isolated from other working areas and bear warning panels to alert people of the presence of asbestos waste. Details of the warning panels required under the Regulation are illustrated in Figure 1. Particular attention should be given to maintain good fire safety measures in the storage area. In the case of asbestos spillage at the storage site, appropriate action as found in section 11 should be taken. For more details on the requirements of storage area, please refer to the Code of Practice on the Packaging, Labelling and Storage of Chemical Wastes published by EPD.

In any process involving asbestos and the generation of asbestos waste, the proprietor, property owner or occupier should ensure that the operation is carried out properly. He should also ensure that his own worker or contractor has sufficient expertise and training in carrying out the operation so as to avoid the release of asbestos fibres. Further advice on asbestos removal operation can be obtained from the Air Management Group of EPD.
8. TRANSPORT TO THE DISPOSAL SITE

- Asbestos waste should be transported to the disposal sites by enclosed skips, open lorries or enclosed vehicles, according to the requirement for each type of waste. The following conditions must be complied with-

  - Types 2 and 3 asbestos waste contained in plastic bags must be transported in enclosed skips which meet the following specifications -
    - Dedicated skips must be exclusively used to transport asbestos waste.
    - Skips must be constructed of steel and possess sealable drain outlet.
    - Skips must be fully enclosed and be of the walk-in type with double lockable door at the rear end. The doors and joints of the skips must be rubber sealed, and the doors must be locked during transport.
    - The capacity of the skips will normally be 9 or 15 m³, and the skips must not be overloaded.
    - Skips must be capable of being hydraulically loaded on and off the transport vehicles.
    - Loading and unloading of the bagged waste must be conducted by hand whilst the skip is in the lowered position (on the ground).
    - The bagged asbestos waste should not be stacked indiscriminately resulting in damage to the bottom bag due to the weight at top.
    - Proper warning panels must be placed on the skips to indicate the carriage of asbestos waste (Details in Appendix C).
    - Pallets of Types 2 and 3 asbestos waste may be carried together within the skips.

- Contaminated skips must be washed down at the disposal sites where wash water may be drained into reception trenches.

- Drummed waste and Type 1 waste are not required to be transported by skips and may be transported by open lorries or enclosed vehicles subject to the following requirements-
  - Vehicles should not be loaded above the free edge of the sideboards.
  - The waste should be secured on the vehicles.
  - Plastic sheets should be used for covering waste on an open type lorry and for lining the vehicles when loaded with Type 1 waste. The used sheets should be disposed of as contaminated waste at the landfill.
  - Proper warning panels must be placed on vehicles to indicate the carriage of asbestos waste (Details in Appendix C).
  - Wash down asbestos contaminated vehicles with water at the disposal sites where the wash water may be drained into reception trenches.

9. DISPOSAL

- The legislation requires that all asbestos wastes must be disposed of at designated or licensed facilities. In Hong Kong the only proven method of disposing asbestos is by secure burial in a landfill site.

- Since asbestos is listed in Part A of Schedule 1 to the Regulation, notification has to be given to EPD for its disposal. Furthermore, disposal at a landfill site requires site preparation, and to allow for this, and the phasing of asbestos disposal with other operations on the site, EPD will normally require ten working days notice of the intention to dispose of any quantity of asbestos waste.
The notification should be made on the prescribed form obtainable from EPD (Appendix D). After processing the notification, EPD will issue specific instructions and directions for disposal of the waste. Generally, the directions will specify the description (i.e. Type 1, 2 or 3) and quantity of the waste; the designated landfill for codisposal; the period of waste delivery; and any special instructions on the disposal method. These directions must be strictly followed by the waste producer or his agent.

Certain operations may produce large quantities of asbestos waste within a short period of time, for instance when a power station or chemical plant is demolished. Waste arising greater than 250m³ in volume will be considered a large quantity. In those circumstances the rate of waste production may exceed the ability of the disposal sites to handle and dispose of the waste and it would be necessary for a waste producer to inform EPD at the planning stage of the operations. The waste producer should provide EPD with his programme of works and the estimated waste arisings so that suitable disposal arrangements can be made. If there is no prior agreement between the waste producer and EPD, the disposal of large arisings of asbestos waste may be severely restricted and more stringent conditions than usual may be imposed by EPD.

At the disposal site, the waste producer or collection contractor should ensure that the disposal operation is carried out in accordance with the instructions of the landfill site staff. Type 1 asbestos waste should normally be disposed of at the tipping face at the location as directed by the landfill operator whilst Types 2 and 3 wastes should be disposed of into pre-excavated trenches. Asbestos waste should be placed into a trench by hand or mechanical crane as appropriate. Placement of waste should progress from one end of the trench to the other. Throwing, dropping of bags and stepping on bags or packages during unloading are strictly forbidden. A half metre clearance at the top of the trench for subsequent backfilling with soil should be allowed for. A trained person who is experienced on working with asbestos should be provided by the waste collector and should be assigned with the responsibility to supervise the disposal operation.

10. TRIP TICKET SYSTEM

A “cradle-to-grave” control system has been introduced under the Regulation, as a mechanism of keeping track of the movement of chemical waste from its point of arising to its final place of disposal (illustrated in Figure 2). For every waste consignment, a waste producer needs to complete a “trip-ticket” before the waste will be accepted for collection from his premises. The waste producer has to keep one copy as a record of the consignment, and the waste collector will retain a further copy of the form upon delivery of the waste to a reception point manager. The original copy will be retained by the reception point manager. Each party in the waste disposal chain has to keep his copy for at least 12 months. At each stage, the receipt of a properly completed trip-ticket is a condition for acceptance of the waste. In addition, the waste collector and reception point manager should send regular returns to EPD in the specified format as required under the waste collection and waste disposal licences respectively. Further details of the trip ticket system can be found in A Guide to the Chemical Waste Control Scheme published by EPD.

11. SAFETY EQUIPMENT AND PROCEDURES

If asbestos waste is packed in the approved containers as soon as it is produced, and handled and transported as recommended in this Code of Practice, there will be little risk of asbestos fibres being emitted. However, as a further precautionary measure, safety and emergency handing equipment should be carried on every delivery vehicle including -

- approved face masks for all workers.
- appropriate heavy duty rubber gloves.
- protective clothing.
- working shoes.
- spare containers/bags and seals.
- shovel.
• amended water (water mixed with wetting agents) in airless spraying equipment – about 50 L.
• emergency and first-aid kit.

The workers should wear the protective clothing and other safety equipment during all loading and unloading operations.

- Immediate action must be taken to prevent asbestos fibres from being released to the air in the event of an accident during transportation, or at a disposal site, resulting in the bursting or splitting of containers and the release of asbestos waste. This is best done by immediately wetting the waste with amended water applied in a fine mist. Protective clothing, appropriate gloves, working shoes and an approved dust mask should be worn for this operation in order to prevent contamination of hair, skin and personal clothing. The gloves are used for protection against friction and abrasion during handling of drums as well as for prevention of contamination. The shovel and spare bags or drums together with seals carried on the vehicle are used for repacking and resealing the split waste. In case of extensive contamination of the environment, EPD should be notified immediately.

- Contaminated vehicles should be thoroughly washed. The washings should be disposed of into the asbestos waste disposal trenches at the disposal sites. All contaminated equipment should be thoroughly washed before reuse. However, if they are difficult to clean, they should be treated as asbestos waste and placed in suitably labelled plastic bags for proper disposal.

- Further advice on safety equipment and procedures may be obtained from the Labour Department or the Marine Department at the addresses shown in Appendix A. Advice on the legislative control under the Factories and Industrial Undertakings (Asbestos) Special Regulations 1986 may also be obtained from the Labour Department.

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Figure 2 - The Trip-Ticket System for Tracking the Consignment of Chemical Waste
APPENDICES
CONTACT NAMES, ADDRESSES AND TELEPHONE NUMBERS

FOR ADVICE ON ASBESTOS REMOVAL

Territorial Control Group
Environmental Protection Department
24th Floor
Southorn Centre
130 Hennessy Road, Wanchai
Hong Kong
Telephone Contact: Asbestos Management and Control Section
2755 3554

FOR ADVICE ON PROCEDURES ON BOARD SHIPS AND FLOATING STRUCTURES

Marine Department
Harbour Building, 23rd Floor
38 Pier Road
Central
Hong Kong
Telephone Contact: Marine Industrial Safety Section
2852 4477

FOR ADVICE ON SAFETY EQUIPMENT AND PROCEDURES AND THE LEGISLATIVE CONTROL ON INDUSTRIAL UNDERTAKINGS

Occupational Safety and Health Branch
Labour Department
25th floor, Western Harbour Centre,
181 Connaught Road West
Hong Kong
Telephone Contact: Advisory and Development Division
2559 2297
APPROVED PACKAGING, CONTAINERS AND LABELLING FOR ASBESTOS WASTE

TYPE A

Transparent plastic sheets of not less than 0.15 mm thickness are to be used for packing Type 1 asbestos waste. Inner plastic sheets should be white for bulky Type 2 waste and orange for bulky Type 3 waste, while the outer plastic sheets should be transparent for both types of waste.

TYPE B

Heavy duty polythene bags complying with the minimum standard prescribed in British Standard BS4932:1973 (Note 2) or equivalent are to be used for packing Types 2 and 3 asbestos waste. Inner bags should be white for Type 2 waste and orange for Type 3 waste while outer bags should be transparent for both types of waste.

The inner plastic sheet or inner bag must be clearly marked with indelible ink as follows -

For Type 1 or 2 asbestos waste:

DANGER CHEMICAL (ASBESTOS) WASTE

DO NOT INHALE DUST

For Type 3 asbestos waste:

DANGER CHEMICAL (BLUE/BROWN ASBESTOS) WASTE

DO NOT INHALE DUST

All letters and characters must be at least 50 mm high. The chemical waste label required under the Regulation shall also be attached (Figures 3 and 4). Figure 5 shows an example of a sheet or bag with markings and label. Information on suppliers of suitable bags is available from EPD at the address shown in the Preface.

NOTE 2: For quality control and assurance purposes, all the parameters specified in BS 4932: 1973 should be tested by an accredited laboratory.
In some cases, particularly where the asbestos waste is wet or heavy, bags may not be appropriate and drums should be used. They should conform to the British Standard for mild steel drums (light duty: removable heads), BS 2003: October 1974. These drums are of the full aperture type and the lids may be secured with latch, lever, or nut and bolt closures. Figure 6 shows examples of drums with appropriate markings and labels, and typical closures.
NOTES ON THE HAZARD WARNING PANEL FOR VEHICLE

One of the two versions (Version A and Version B) of the hazard warning panel as shown in Figure 7 should be displayed at the front and rear of the vehicle in a position that does not conceal any lights, licence plates or other legally required signs or markings. Both versions are acceptable, and the choice is mainly governed by the space available for the sign.

Specifications:

1. Material: aluminium plate (1.6 mm)
2. Finish: reflective background
3. Retro reflective material: class 2, BS 873
4. Colours: the colour of the sign face sheet material, sign face material or finish shall be as follows:
   - Border: Black
   - Background: Yellow
   - Characters, Letters: Black
5. All sign face sheet material, sign face material, edge sealant, clear coat lacquers and silk screen inks used shall be mutually compatible.
6. Size: Letters (Height $\geq$ 60 mm), Characters (Height $\geq$ 60 mm)

Figure 7 - Hazard Warning Panels for Vehicle

(The rectangular lines forming the tiles do not form part of the actual sign)
# NOTIFICATION FORM

| Environmental Protection Department | For Official Use: This form is not to be used in place of the relevant waste disposal legislation. Reference No.: 

## A. WASTE PRODUCER

- **Full Name**: [Name]
- **Address for Correspondence**: [Address]
- **Tel. No.**: [Phone]

## B. LOCATION OR PREMISES WHERE THE WASTE IS PRODUCED

- **Name of Establishment**: [Name]
- **Nature of Business**: [Business]
- **Tel. No.**: [Phone]

## C. ACTIVITY OR PROCESS WHICH PRODUCES 'PART A' CHEMICAL WASTE

- **Brief description of the activity or process(es)**: [Description]

## D. WASTE DESCRIPTION

- **List all 'PART A' chemical wastes which are produced at the above location or premises and which are intended for disposal**: [List]

## E. PROPOSED DISPOSAL ARRANGEMENT

- **For each waste type set out in D.**

## F. REMARKS

- **Include any additional information for safe handling of the waste(s)**: [Remarks]

## G. DECLARATION

- **Signature**: [Signature]
- **Name in Block Letters**: [Name]
- **Capacity**: [Capacity]

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**WARNING**: Any person(s) who fails to give notice to the Director of Environmental Protection as required under Section 17 of the Waste Disposal Ordinance commits an offence punishable with a fine of HK$100,000 for the first offence, and a maximum fine of HK$200,000 and 6 months' imprisonment for a second or subsequent offence.

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**APPENDIX D**

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