



BBV JV

Landscape Bund at Pool Wood Embankment

Appendix G - Waste Acceptance Procedure

3020094 – Permit Application

RSK GENERAL NOTES

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Where field investigations have been carried out, these have been restricted to a level of detail required to achieve the stated objectives of the work.

This work has been undertaken in accordance with the quality management system of RSK Environment Ltd.

BBV JV

Appendix G – Waste Acceptance: Pool Wood Embankment

3020094 (01)

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1 INTRODUCTION

1.1 Report Context

RSK Environment Limited (RSK) was commissioned by BBV JV to prepare a Waste Acceptance Procedure as part of supporting documentation for an application to obtain a Bespoke Environmental Permit relating to earthworks to create a landscape bund alongside Pool Wood Embankment, Birmingham, hereafter referred to as the 'Site'.

1.1.1 Waste Acceptance Procedure

The purpose of this Waste Acceptance Procedure is to ensure that the Site only accepts waste that is:

- Suitable for use on this site.
- Listed within the permit.
- Appropriately considered by the Environmental Risk Assessment.

The procedure will also assist with ensuring that no pollution arises as a result of the waste accepted onto site.

1.2 Operator and Agent

The Environmental Permit application and this summary have been prepared by RSK Environment Ltd (RSK) which is acting as an 'Agent' on behalf of the proposed 'Operator', Balfor Beatty Vinci Joint Venture (BBV JV), which is made up of four companies including:

- Balfour Beatty Group Limited - company registration number 00101073.
- VINCI Construction Grands Projects - company registration number FC017187.
- VINCI Construction Terrassement UK Limited - company registration number 10264076.
- VINCI Construction UK Limited - company registration number 02295904.

1.3 Background

Pool Wood Embankment is located approximately 10 km to the south-east of Birmingham City Centre. The M42 motorway and a roundabout are situated at the southern boundary and the M6 motorway is present at the northern boundary. The A446 is present approximately 450 m to the east of the site. The site extends from the south of the roundabout and runs alongside the M42 motorway until it encounters the M6 motorway to the north.

The site forms part of the wider HS2 works in the area.

The materials required to form site levels appropriate for the construction of the landscape bund will comprise the use of both material imported to site and waste material imported to site from other sites being developed as part of the overall HS2 development.

Middle Bickenhill Landfill (MBL)

All of the waste material should derive from the nearby closed Middle Bickenhill Landfill (MBL) which will require excavating in order to create an appropriate platform upon which to build the Birmingham Interchange Station (BIS). MBL is located approximately 1.8 km south of Pool Wood Embankment. Some additional suitable waste materials may be imported from elsewhere should they be required.

Between 1962 and 1985 MBL accepted inert, industrial, commercial, household, and special wastes. Ground investigations and assessments have reported the presence of asbestos, asbestos containing materials (ACM), hydrocarbons, and metal contaminants. In addition the landfill also contains deleterious materials including wood, plastics, and “black bag” waste products. The landfill was licensed in 1978 and became void in 1982 when the licence holder went into receivership.

To accommodate the construction of Middle Bickenhill Cutting, as part of the design, MBL will be removed in accordance with the approved Remediation Implementation Plan (RIP) to a defined formation elevation to allow the placement of suitable materials upon which to construct.

Waste material excavated from MBL will be screened and segregated into stockpiles. Assessment of this waste will be made to determine if any of the excavated material can be reused at MBL to develop the site. Any material unsuitable for reuse at site will be removed to an appropriately permitted facility. Some of the waste removed will be hazardous in nature and other material will be non-hazardous wastes such as black bag, putrescible and plastic.

It should be noted that a Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS) investigation was undertaken in June-July 2024 by the BBV remedial contractor, with the results presented to the Environment Agency on 9 August 2024. Soil samples were collected from MBL and surface and groundwater samples from MBL. Low levels of PFAS (above LOD) were identified in all but one water sample location and some soil sample locations. The assessment concluded that no soil or water remediation is required for PFAS, with remediation at MBL to remove PFAS high risk items. No additional sampling for PFAS was proposed during remediation works at MBL. The EA have raised no objections to the assessment findings, conclusions and the approach.

Hardcore/soils materials will be processed and crushed into class 6F1, 6F2, general fill classes 1&2 and landscape fill class 4 material (whichever is most suitable and required) for reuse at the site. Materials considered visually suitable will be subjected to validation sampling at a frequency of 1 sample per 250 m³, and laboratory analysis to allow comparison against Site Specific Acceptability Criteria (SSAC) for the site. Material adhering to the SSAC will be deemed suitable for reuse at the site. Materials failing the SSAC will either be subjected to remedial treatment (e.g. bioremediation and stabilisation or similar to be completed at MBL) to reduce determinant concentrations to comply with the SSAC or be subjected to further risk assessment and/or removed for offsite disposal to a licensed waste facility.

Any excavated material identified as potentially containing Japanese Knotweed will be removed from MBL and sent for disposal at a licensed waste facility. None of this material will be sent to Pool Wood Embankment.

Asbestos and asbestos containing materials have been identified at MBL. These materials will also be excavated, processed and removed from MBL for transportation to a licensed waste facility. Only soils reporting asbestos at <0.1 (w/w) will be deemed acceptable for reuse at Pool Wood Embankment.

Regardless of their source, all waste materials to be deposited will be tested thoroughly to determine their suitability for reuse. As a sustainable approach, the reuse of waste materials is considered environmentally beneficial by reducing the use of virgin material and the need for landfill disposal.

In order to accommodate this proposal, and deposit waste at the site, an environmental permit for waste recovery (Deposit for Recovery or DfR) will be required. Due to the proximity of the site to a protected site and the expected quantities to be deposited, a bespoke environmental permit will be required.

The length of the embankment and accompanying landscape bund will be approximately 1,414 m. The height of the earthwork varies throughout the length of the landscape bund, with a maximum height from ground level to the top of the protection layer of approximately 14 m. No waste will be used in the construction of the embankment. It will only be used in the construction of part of the landscape bund.

Some of the material used within the embankment and for part of the landscape bund will comprise of clean and uncontaminated materials that meet specific structural specifications.

However, the majority of the materials to be reused on site within the landscape bund will be considered waste due to their nature and where they derive from.

Prior to acceptance on site for use as fill within the landscape bund, the waste material will be tested to ensure it meets the assigned site-specific acceptance criteria (SSAC).

It has been calculated that approximately 178,810 m³ of material will be excavated from the Middle Bickenhill Landfill. This material will then be subjected to treatment at source to remove any contaminants. Based on an estimated 10% of this excavated material being unsuitable for reuse it is estimated that approximately 160,929 m³ of treated excavated waste material will potentially be suitable for reuse at Pool Wood Embankment.

Should there be a shortfall then suitable wastes may potentially be sourced from throughout the HS2 development. At this time the precise locations are not known. As a result, a robust waste acceptance procedure will be adopted for all wastes received and accepted at the site.

2 WASTE PRE-ACCEPTANCE AND ACCEPTANCE PROCEDURE

2.1 Acceptable Waste Types

Only the waste types listed in **Table 1** below will be accepted onto site.

All waste accepted at site will be both chemically and physically suitable for reuse as general fill. No contaminated materials will be accepted.

Table 1: Permitted Waste Types

EWC Code	Description
01	WASTES RESULTING FROM EXPLORATION, MINING, QUARRYING AND PHYSICAL AND CHEMICAL TREATMENT OF MINERALS
01 01	Wastes from mineral excavation
01 01 02	Waste from mineral non-metalliferous excavation
01 04	Wastes from physical and chemical processing of non-metalliferous minerals
01 04 08	Gravel and crushed rocks other than those mentioned in 01 04 07
01 04 09	Waste sand and clays
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 01	Concrete, bricks, tiles and ceramics
17 01 01	Concrete
17 01 02	Bricks
17 01 03	Tiles and ceramics
17 01 07	Mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06
17 05	Soil, stones and dredging spoil
17 05 04	Soil and stones, including chalk, other than those mentioned in 17 05 03*
17 05 06	Dredging spoil other than those mentioned in 17 05 05*
17 05 08	Track ballast, other than those mentioned in 17 05 07*
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE
19 12	Wastes from the mechanical treatment of waste (e.g. sorting, crushing, compacting, pelletising) not otherwise specified
19 12 05	Glass (for fill purposes only, not for use in restoration top layer)
19 12 09	Minerals (for example sand and stones)**
19 12 12	Crushed bricks, tiles, concrete and ceramics, including mixtures of materials***

EWG Code	Description
19 13	Waste from soil and groundwater remediation
19 13 02	Solid wastes from soil remediation other than those mentioned in 19 13 01
*Where clean naturally occurring topsoil is received from the cover layers, then this may be used within the topsoil subject to suitability and agreement with the DJV land quality lead. **Excludes fines from treatment of any non-hazardous waste and gypsum from recovered plasterboard. ***Can comprise of the following – • Soil substitutes other than those containing dangerous substances only – should not include hazardous waste or dangerous substances. The soil substitute must be free from contaminants such as asbestos fragments, plastics, glass, metals, treated timber, foils and films. If deposited in place of non-waste topsoil it must meet the British Standard for topsoil BS 3882:2015 • Crushed bricks, tiles, concrete and ceramics, including mixtures of materials - excludes metal from reinforced concrete, fines from treatment of any non-hazardous waste and gypsum from recovered plasterboard.	

There is no intention to accept any other wastes apart from those listed in **Table 1** at the Site and the waste acceptance procedure will be implemented in order to ensure that all waste accepted meets Site Specific Acceptance Criteria (SSAC) and is suitable for use. Documentation will accompany all waste material accepted.

Waste shall only be accepted and/or redeposited if it is of a type listed in **Table 1** and meets the additional restrictions in that table and:

- It is compliant to the sites' acceptance classification.
- Appropriate measures will be taken to ensure that the waste is free from contamination.
- It has been identified as a suitable waste in the approved Waste Recovery Plan.
- It's chemical, physical and biological characteristics make it suitable for its intended use on the site.

All waste will be subject to waste acceptance procedures at the site.

Staff responsible for receiving and accepting waste at the site will be trained in the procedure to ensure they are competent.

2.2 Pre-Acceptance Procedure

All waste received at Pool Wood Embankment will have been generated by the operator on other sites related to HS2. As waste will be both excavated and deposited by the same operator it should not escape the operator's control.

Regardless, in order to maintain accurate records of the materials deposited at Pool Wood Embankment, when waste is to be accepted from MBL or any other site, the following information shall be recorded prior to receipt:

- The full address where the waste was produced (i.e. Middle Bickenhill Landfill).
- The (legal) identity of the waste producer (i.e. BBV JV).

- All the reasonably identifiable previous uses of the producer site (where the waste is excavation waste), i.e. landfill.
- A description of the waste (including EWC code).
- The process giving rise to the waste (i.e. details of any treatment).
- The physical appearance of the waste including size, colour and texture.
- The chemical characteristics of the waste (i.e. any testing and comparison with SSAC).
- The quantity of the incoming waste.

In the event that there is suspicion of contamination in the waste coming to site, then this must be queried and tested.

The SSAC that will be adopted at the site are detailed in **Table 2**. Further information on how these SSAC have been derived is outlined within the Hydrogeological Risk Assessment and Material Acceptability Criteria Risk Assessment Report prepared for the site and to support the environmental permit application (see **Appendix J** of the permit application)

The pre-acceptance procedure will result in either the waste:

1. Being approved for delivery to the site as one of the permitted wastes in **Table 1** and therefore suitable for recovery at the site.
2. Failing the site's waste pre-acceptance criteria and therefore not approved for delivery to the site.

If the waste is not approved, then the waste is unsuitable for receipt at the site.

The operator (and in particular the site where the waste was produced) is responsible for ensuring that the sampling procedure employed characterises the waste both chemically and physically, and accounts for the variability of the waste stream.

Prior to the movement and placement of MBL sourced materials at the site, soil and soil leachate samples will be collected at a frequency of 1 sample per 250 m³. It will be ensured that the determinant concentrations remain below or at the SSAC (presented in **Table 2**) to be protective of human health and controlled waters.

Table 2: Site Specific Acceptance Criteria for Accepted Waste Materials

Component	Leachate SSAC (mg/l)	Soils SSAC (mg/kg)
Acenaphthene	NA	4773
Acenaphthylene	NA	4773
Aliphatic >C10-C12	NA	4773
Aliphatic >C12-C16	NA	4773
Aliphatic >C16-C21	NA	4773

Component	Leachate SSAC (mg/l)	Soils SSAC (mg/kg)
Aliphatic >C21-C35	NA	4773
Aliphatic >C35-C44	NA	4773
Aliphatic >C5-C6	36	4773
Aliphatic >C6-C8	NA	4773
Aliphatic >C8-C10	NA	4773
Anthracene	NA	4773
Antimony	NA	3300
Aromatic >C10-C12	NA	4773
Aromatic >C12-C16	NA	4773
Aromatic >C16-C21	NA	4773
Aromatic >C21-C35	NA	4773
Aromatic >C35-C44	NA	4773
Aromatic >C5-C7	1800	4773
Aromatic >C7-C8	200	1523
Aromatic >C8-C10	NA	4773
Arsenic	NA	170
Barium	1.01	5800
Benzo(a)anthracene	NA	49
Benzo(a)pyrene	NA	21
Benzo(b)fluoranthene	NA	2083
Benzo(g,h,i)perylene	NA	1400
Benzo(k)fluoranthene	NA	370
Benzene	284	27
Beryllium	NA	12

Component	Leachate SSAC (mg/l)	Soils SSAC (mg/kg)
Boron	NA	46000
Cadmium	NA	410
Chromium Hexavalent	NA	49
Chromium III	NA	8600
Chrysene	NA	93
Copper	NA	44000
Dibenz(a,h)anthracene	NA	171
Ethylbenzene	180	4773
Fluoranthene	NA	4773
Fluorene	NA	4773
Indeno(1,2,3-cd)pyrene	NA	150
Lead	NA	1300
Mercury	NA	30
Naphthalene	1.26	18
Nickel	NA	800
PCB 105	NA	0.07
PCB 114	NA	0.07
PCB 77	NA	0.07
PCB-118 2,3',4,4',5 - Pentachlorobiphenyl	NA	0.07
Phenanthrene	NA	4773
Pyrene	NA	4773
Phenol	1	440
Selenium	0.01	1800

Component	Leachate SSAC (mg/l)	Soils SSAC (mg/kg)
Styrene	103	1243
Toluene	80	607
TPH >C5-C44	-	4773
Total PAH	-	4773
Vanadium	NA	5000
Xylenes	15	184
Zinc	NA	170000
<u>Notes.</u> Grey cells represent concentrations above the soil saturation limits which could be mobile due to connectivity or gravity. To limit the potential for free phase oils, the maximum concentration of the sum of TPHs and PAHs has been limited to the residual NAPL concentration. Orange cells represent organic leachate SSACs. This is limited to the solubility threshold. Brown cells show where a soil SSAC has been derived from CLEA DQRA modelling. The phenol (turquoise cell) SSAC has been conservatively limited to 1 mg/l on the basis that previous studies have shown that phenols at concentrations from 200 mg/l inhibits or is toxic to bacteria. Blue cells show where a derived controlled water SSAC has been adopted. Green cells show where a human health SSAC has been adopted. Where SSACs are marked as "NA", the retarded travel time is >1000 years and/or no SSAC has been quantified. SSACs for asbestos in soils and invasive species are not derived as these will be managed in accordance with the asbestos acceptability criteria and the EWC biosecurity management plan.		

2.3 Acceptance Procedure

Upon delivery of waste to the Site, the following processes will occur:

- Visual inspection of pre-approved loads at gate.
- Checking and completion of paperwork accompanying each load.
- Inspection of loads during and following discharge.
- Verification sampling and testing, where required.
- Rejection and/or quarantine of unacceptable loads.

2.3.1 Visual Inspection of Pre-approved Loads at Gate

All drivers delivering waste to the Site will be required to disclose the nature of the waste they are carrying and provide relevant documentation upon arrival at the site gate.

All loads of waste delivered to site will be pre-arranged. Upon arrival they will be visually inspected where practicable. The objective of this initial inspection is to detect the presence of any unauthorised waste. Vehicles that arrive at the site sheeted will be required to unsheet to allow this inspection to take place before they are permitted to proceed.

Any cameras used should be capable of being able to swivel and rotate and be able to zoom in to visually inspect the whole of the inside of the inbound HGV.

It is only after the site operative is satisfied that the inbound waste meets the criteria for the agreed waste code that the load can be accepted onto the site.

Any odorous materials will be rejected as potentially contaminated.

2.3.2 Checking and Completion of Paperwork Accompanying Each Load

Staff on site will ensure that fully completed waste transfer documentation is received for every load (unless part of a multiple consignment). This can be either electronic or physical tickets.

Only registered waste carriers will be allowed to transport waste between the sites. Any new waste carrier must provide evidence of registration before being allowed to transport waste.

If any waste carriers do not have the correct registration they will be prevented from depositing waste until all of the necessary checks have been undertaken.

Once satisfied that everything relating to a load is acceptable, the load will be directed to the unloading/tipping area, prior to deposit for recovery.

2.3.3 Inspection of Loads During and Following Discharge

On arrival at the unloading/tipping area, the load will be deposited as directed by the competent site staff.

Every load of waste will be observed by the competent site staff as it is discharged from the vehicle. This will be to check for any visible unauthorised materials present within the load. In the event of suspicion regarding the waste, the delivery driver will be asked to observe as well prior to any further action being undertaken.

When the competent person has satisfied themselves as to the acceptability of the waste, it will then be ready to be deposited in the deposition area or into a temporary stockpile if immediate deposition is not possible.

If unauthorised/non-conforming waste is observed or suspected it will be dealt with in accordance with the waste rejection and/or quarantine procedures.

2.3.4 Verification sampling and testing

In the event that there is suspicion of contamination, waste will be tested. The waste acceptance criteria that will be adopted is outlined in **Table 2**.

Additional chemical testing may also be required in order to classify the waste. Waste classification testing will be undertaken in accordance with the Environment Agency's Technical Guidance WM3 – Guidance on the classification and assessment of waste.

Waste to be sampled and tested will be stored in a separate area of the Site and following sampling will be quarantined and not disturbed until the sample results are received.

If the waste is not contaminated it may be deposited as usual.

If the waste is found to be contaminated, then the process outlined in Section 3 will be followed.

2.3.5 Rejection of Unacceptable Loads

Waste will be rejected from site in the following circumstances:

- If the waste has not been pre-approved.
- If the waste does not conform to the description on accompanying paperwork, the waste transfer documentation or any Approved Job List.
- If the waste is delivered by an unauthorised carrier.
- If the visual inspections and/or sampling and testing reveal the presence of unauthorised waste.

In these circumstances the load will be rejected from site and the responsible staff on site will advise the driver and the relevant staff at the site of origin that the load is rejected. Relevant paperwork will be completed.

If a load is rejected before completion of paperwork accepting the waste on site, there will have been no 'transfer' of the waste from the carrier and accordingly a new waste transfer note will not be created. If waste is rejected following completion of the original transfer note, a new transfer note will be generated.

If, for any reason, the carrier and any relevant staff at the site of origin are not present to be informed the waste has been rejected, the unacceptable waste will be quarantined in the designated area on site until the relevant people can be informed and a course of action agreed.

The operator will ensure they maintain a record of all unacceptable loads and any action taken.

3 REJECTION AND QUARANTINE PROCEDURE

The objectives of the rejection and quarantine procedure is to ensure that all non-conforming waste is removed from site when identified, and that the site of origin and carrier are informed so that appropriate action can be taken to prevent a re-occurrence.

In all cases where waste is to be rejected from site, the site manager must be informed, and the incident and actions taken recorded in the site diary or on another appropriate form.

3.1 Rejection at Site Gate

Waste will be rejected from site by the competent staff at the gate in the following circumstances:

- If the waste has not been pre-approved.
- If the waste does not conform to the description on the accompanying paperwork.
- If the waste is delivered by an unauthorised carrier.
- If the visual (and olfactory) inspection reveals the presence of unauthorised waste.

In these circumstances the load will be rejected from site and site staff will issue relevant paperwork to the driver.

3.2 Rejection at Unloading/Tipping Area

If unauthorised waste is observed by site staff either during or after deposit, the driver of the vehicle will be alerted, and the waste will be reloaded onto the vehicle where possible. The vehicle will then be redirected to the site entrance, issued with relevant paperwork and asked to return the waste to the site of origin or redirect to an appropriately permitted site that can accept the waste.

If the vehicle has left the operational area, site staff will attempt to intercept the vehicle before leaving the Site so that the waste can be re loaded, and relevant paperwork issued.

If the vehicle has left the Site before the presence of unauthorised waste is identified, the waste will be isolated and/or moved to a temporary 'quarantine' storage area.

The waste carrier will then be contacted and asked to remove the waste from site as soon as possible and the material will be returned to the MBL processing area for further treatment. Should staff at MBL determine that additional treatment is not feasible, only then will the material be sent offsite to a suitably permitted facility.

In the event it is necessary to sample such waste to identify a suitable treatment facility, the necessary sampling will be carried out. The waste will be stored in the quarantine area until a suitable alternative facility has been identified.

A skip will be maintained close to the operational area and will be used for the storage of isolated contaminants identified within loads of waste which would not warrant rejection

of the load. Such inclusions may include very minor amounts of plastic, wood or other refuse. These minor physical contaminants will be removed from the load and placed in skips prior to off-site removal.

4 RECORD KEEPING

4.1 Waste Transfer Documentation

All waste accepted for recovery at the Site will be accompanied by a waste transfer documentation, which will provide all of the required details. This includes:

- Waste description including appropriate waste classification code.
- Quantities.
- Site of Origin.
- Transferor and transferee.
- Signatures of transferor and transferee.
- Waste carrier registration details.
- Time and date of transfer.

4.2 Records of Quantities Deposited

A register of the quantities and characteristics of waste accepted at the site will be maintained on a computerised database/spreadsheet. The database will include the following details:

- Source of waste.
- Date of delivery.
- Waste quantity.
- Waste description and classification code.
- Waste carrier details.

Access to this database/spreadsheet will be available on site. A record will also be maintained of all waste that is removed from the facility.

4.3 Waste Characterisation & Analysis Records

Copies of all information relating to the characterisation and analysis of waste accepted at the site will be maintained.

4.4 Site Diary

A record of any significant transfers will be maintained within a site diary. This will include, but may not be limited to, any waste rejections and communications with the regulator.

APPENDIX A

SERVICE CONSTRAINTS

1. Service Constraints

1.1. This Report (the "Report") and any study, inspection, investigation, sampling, testing and or interpretation carried out in connection with the Report (together the "Services") were compiled and carried out by RSK Environment Limited (RSK) trading as Carbon Zero Consulting, Leap Environmental or RSK Geosciences, for the Client named in the first paragraph of the Report (the "Client") in accordance with the terms of an RSK Fee Proposal including RSK Environment Standard Terms and Conditions (the "Appointment") between RSK and the Client, unless otherwise stated in the first paragraph of the Report. The Services were performed by RSK with the reasonable skill and care ordinarily exercised by a geo-environmental consultant at the time the Services were performed. Nothing in this Report shall be construed as imposing any fitness for purpose obligation. Further, and in particular, the Services were performed by RSK taking into account the limits of the scope of works required by the Client, the time scale involved and the resources, including financial and manpower resources, agreed between RSK and the Client.

1.2 Other than that, expressly contained in paragraph 1 above, RSK provides no other representation or warranty whether express or implied, in relation to the Services. RSK shall not be liable in respect of any action or proceedings arising out of or in connection with this Report whether in contract, in tort, for breach of statutory duty or otherwise after the expiry of six (6) years from either (i) the date of the Report or (ii) such earlier date as prescribed by law, unless varied in the terms of the Appointment.

1.3 Unless otherwise agreed in writing, the Services were performed by RSK exclusively for the purposes of the Client. RSK is not aware of any interest of or reliance by any party other than the Client in or on the Services. Unless expressly provided in writing, RSK does not authorise, consent, or condone any party, other than the Client relying upon the Services. Should this Report or any part of this Report, or details of the Services or any part of the Services, be made known to any such party, and such party relies thereon, that party does so wholly at its own and sole risk, and RSK disclaims any liability to such parties. Any such party would be well advised to seek independent advice from a competent geo-environmental consultant and/or lawyer.

1.4 The Client shall not, without the prior written consent of RSK, assign, transfer, charge, mortgage, subcontract, or deal in any other manner with all or any of the benefits provided in this Report. Unless specified in the Appointment, RSK shall not be obliged to assign the benefit of the Report whether by collateral warranty, third party rights pursuant to the Contracts (Rights of Third Parties) Act 1999, letter of reliance or otherwise. If RSK agrees to any assignment of the benefit of this Report, in whatever form, benefits to third parties through collateral warranties, third party rights or letters of reliance shall not be provided unless a fee for each right, warranty or letter is agreed. The form of wording used in the warranty or letter shall be provided by RSK for agreement by the Client. Any reasonable changes to the form of wording will be implemented by mutual agreement, however the terms in the warranty or letter cannot offer the third party any greater benefit than the Appointment offered to the Client.

1.5 It is the understanding of RSK that this Report is to be used for the purpose described in the introduction to the Report. That purpose was a significant factor in determining the scope and level of the Services. Should the purpose for which the Report is used, or the proposed use of the site change, this Report may no longer be valid and any further use of or reliance upon the Report in those circumstances by the Client without the review and advice of RSK shall be at the Client's sole and own risk. RSK shall not be liable for any use of this Report for any purpose other than that for which it was provided.

1.6 The passage of time may result in changes in site conditions, regulatory or other legal provisions, technology or economic conditions which could render the Report inaccurate or unreliable. The information and conclusions contained in this Report should not be relied upon in the future without the written advice of RSK. In the absence of such written advice of RSK, reliance on the Report in the future shall be at the Client's own and sole risk.

1.7 The observations and conclusions described in this Report are based solely upon the Services which were provided pursuant to the agreement between the Client and RSK. RSK has not performed any observations, investigations, studies or testing not specifically set out, or required by the Appointment between the Client and RSK. RSK is not liable for the existence of any condition, the discovery of which would require performance of services not otherwise contained in the Services. For the avoidance of doubt, unless otherwise expressly referred to in the introduction to this Report, RSK did not seek to evaluate the presence on or off site of asbestos, invasive plants, electromagnetic fields, lead paint, heavy metals, radon gas, fuel storage, persistent bio-accumulative or toxic chemicals (including PFAS and related compounds) or other radioactive or hazardous materials, unless specifically identified in the Services.

1.8 The Services are based upon RSK's observations of existing physical conditions at the Site gained from a visual inspection of the site together with RSK's interpretation of desk based publicly available information, including documentation, obtained from third parties and from the Client on the history and usage of the site, unless specifically identified in the Services and the limitations below:

- a. The Services were based on information and/or analysis provided by independent testing and information services or laboratories upon which RSK was reasonably entitled to rely.
- b. The Services were limited by the accuracy of the information, including documentation, reviewed by RSK and the observations possible at the time of the visual inspection.
- c. The Services did not attempt to independently verify the accuracy or completeness of information, documentation or materials received from the Client or third parties, including laboratories and information services, during the performance of the Services.
- d. The Client has identified in writing to RSK, the information, reports, findings, surveys and preliminary works RSK may not rely upon when providing the Services.

RSK is not liable for any inaccurate information or conclusions, the discovery of which inaccuracies required the doing of any act including the gathering of any information which was not reasonably available to RSK, and including the doing of any independent investigation of the information provided to RSK, save as otherwise provided in the terms of the Appointment between the Client and RSK.

1.9 Any site drawing(s) provided in this Report is (are) not meant to be an accurate base plan for scale measurement but is (are) used to present the general relative locations of features on, and surrounding, the site. Features (intrusive and sample locations etc) annotated on site plans are not drawn to scale but are centred over the approximate location. Such features should not be used for accurate setting out and should be considered indicative only.

1.10 Should RSK be requested to review the Report after the date of issue of this Report, RSK shall be entitled to additional payment at the existing rates, or such other terms as agreed between RSK and the Client.

2. Service Constraints where the Report provides an intrusive assessment of ground conditions:

2.1 The intrusive environmental ground investigation aspects of the Services are a limited sampling of soil from the site, at pre-determined locations based on the known historic / operational configuration of the site. The conclusions given in this Report are based on information gathered at the specific test locations and can only be extrapolated to an undefined limited area around those locations. The extent

of the limited area depends on the properties of the materials adjacent and local conditions, together with the position of any current structures and underground utilities and facilities, and natural and other activities on site. In addition, chemical analysis was carried out for a limited number of parameters (as stipulated in the scope agreed between the Client and RSK, based on an understanding of the available operational and historical information) and it should not be inferred that other chemical species (not tested) are not present.

2.2 The comments given in this Report and the opinions expressed are based on the ground conditions encountered during the site work and on the results of tests made in the field and in the laboratory. The extent of the exploratory holes, laboratory testing and monitoring undertaken may have been restricted due to a number of factors including accessibility, the presence of buried or overhead services, current development, site usage, timescales or the Client's specification. The exploratory holes only assess a small proportion of the site area with respect to the site as a whole, and as such may only provide an indicative assessment of ground conditions on site. There may be conditions pertaining to the site that have not been disclosed by the investigation and therefore could not be taken into account. In particular, it should be noted that there may be areas of made ground not detected due to the limited nature of the investigation or the thickness and quality of made ground across the site may be variable. In addition, groundwater levels and ground gas concentrations and flows, may vary from those reported due to seasonal, or other, effects and the limitations stated in the data should be recognised. The presence of hotspots of undisclosed contamination or exceptional and unforeseen ground conditions cannot be discounted.

2.3 Where the Services include Investigation of an exploratory nature or relating to physical ground works, any costings and prices provided in the Report are estimated and provided for guidance purposes only. The actual cost and time quantities shall be remeasured and shall be dependent upon the ground or other conditions, constraints present, and number and depth of the investigation locations, which shall influence the number of samples and tests required, and the quantities of soil being classified.

2.4 Asbestos is often observed to be present in soils in discrete areas. Whilst asbestos-containing materials may have been locally encountered during the fieldworks or supporting laboratory analysis, the history of brownfield and demolition sites indicates that asbestos fibres may be present more widely in soils and aggregates, which could be encountered during more extensive ground works. However, this Report does not constitute an asbestos survey. On this basis, the presence of asbestos on site cannot be discounted and a full asbestos survey should be undertaken.

2.5 Unless stated otherwise, only preliminary geotechnical recommendations are presented in this Report and these should be verified in a Geotechnical Design Report, once proposed construction and structural design proposals are confirmed. Eurocode 7 gives guidance on the type of sampling, sample quality, number and spacing of intrusive investigations, and number of laboratory tests required. It is intended that the Geotechnical Information section of this Report will fulfil the general requirements of the Ground Investigation Report as set out in section 6 of Eurocode7, although this is subject to the restrictions imposed on the investigation, as listed above. For geotechnical design, Eurocode 7 requires the Geotechnical Design Report to address both the geotechnical and structural aspects of the geotechnical design for both the limit and serviceability states. The Geotechnical Appraisal section of this Report will not meet the requirements of a Geotechnical Design Report (GDR) and should therefore be used for preliminary guidance only.

3. Service Constraints where the Report relates to Surface Water Management:

3.1 The Surface Water Management Inspection (SWMI) Report, documents provided, observations, actions, and recommendations, with respect to the management of potential pollution issues to surface waters, made during the site Inspection visit, are those present at the time of the visit, and may not represent those recorded by others on the same day.

3.2 The comments given in this Report and the opinions expressed are based on the weather, ground and ground water conditions encountered during the site work and on the results of tests made in the field and in the laboratory. However, there may be conditions pertaining to the site that have not been disclosed by the inspection and therefore could not be taken into account. In addition, groundwater levels and flows, may vary from those Reported due to seasonal, or other, effects and the limitations stated in the data should be recognised.

3.3 RSK places a degree of dependence upon oral information provided by site representatives, which is not readily verifiable through visual inspection, or supported by any available written documentation. RSK shall not be held responsible for conditions or consequences arising from relevant facts that were not fully disclosed by facility or site representatives at the time this Report was prepared.

3.4 This Report is a live document, to be continually reviewed and updated as the development progresses or other changes occur on site. RSK can only maintain the currency of this Report through the Client requesting support with supplementary site visits or attendance at meetings ahead of key stages of the development in relation to surface water management. Our risk rating assesses a number of risk factors in line with the source-pathway- receptor model and is therefore subject to constant change.

3.5 Standard design drawings are indicative. Material types, dimensions and construction details will need to be adjusted by the Client to suit the specific conditions / flows on Site.

3.6 The full responsibility for implementing the site-specific protection and maintenance measures to protect the surface water system as stated in this Report, remains with the Client and their site management team. Additional control measures may be required to achieve the objectives set out in the Surface Water Management Plan to be implemented and financed by the Client.

4. Service Constraints where the Report relates to Waste Management:

4.1 In accordance with the definition provided in the Waste Framework Directive (WFD), materials are only considered waste if 'they are discarded, intended to be discarded or required to be discarded, by the holder'. Naturally occurring soils are not considered waste if re-used on the site of origin for the purposes of development. Soils such as made ground that are not of clean and natural origin (irrespective of whether they are contaminated or not) and other materials such as recycled aggregate, do not necessarily become waste until the criteria above are met. Excavation arisings from the development may therefore be classified as waste if surplus to requirements and/or unsuitable for re-use.

4.2 It is the duty of the waste producer, to ensure that all waste is accurately classified prior to waste disposal. Technical Guidance WM3 (EA, 2018) sets out in its Appendix D requirements for waste sampling. It is a legal requirement to correctly assess and classify waste. The level of sampling should be proportionate to the volume of waste and its heterogeneity. Unless otherwise stated, the waste assessment presented in this Report should be considered as preliminary and further testing and assessment of the waste under the provisions of a Waste Sampling Plan may be required to obtain the necessary level of data required for basic characterisation of the waste in support of disposal.

4.3 Unless stated otherwise in the Report, information relating to historical operations at the site was not reviewed as part of the assessment by RSK. In addition, unless otherwise stated in the Services, RSK was not present during the collection of the samples nor had any input on the chemical testing suite. Therefore, the waste assessment and classification detailed in this Report are based solely on any information that were provided to RSK (e.g., laboratory chemical data, exploratory hole records) and were completed without prejudice for our Client.

4.4 RSK assumes that any ground investigation data, chemical testing results etc., that were provided by the Client to inform the waste assessment and supporting review were carried out in accordance with current best practice and relevant guidance/ standards, where applicable. Thus, the



comments given in this Report and the opinions expressed are based solely on the information provided by the Client. However, it is noted that there may be conditions pertaining to the site that have not been disclosed by the investigation and therefore could not be taken into account as part of the RSK assessment.

5. Service Constraints for Construction Environmental Management Plan Reports:

5.1 This Report should be considered in the light of any changes in legislation, statutory requirement or industry practices that may have occurred subsequent to the date of issue.

5.2 The measures and comments outlined in this Report and any opinions expressed are based on the plans provided at the time and discussions with relevant parties. However, there may be conditions pertaining to the site that have not been disclosed by investigations and therefore could not be taken into account.

5.3 This CEMP is a live document and is subject to change throughout the project, as and when necessary, to ensure management of environmental aspects remains relevant, and to ensure continued compliance with legislation and commitments as they may change. RSK understands that this CEMP will be reviewed by the Client every six months and updated as and when necessary.

5.4 It is the full responsibility of the Principal Contractor/ Client to ensure that their works do not contravene legal requirements, and adherence to this CEMP alone cannot be a full defence regarding legal action against the Principal Contractor.

6. Service Constraints where the Report relates to Ground Gas Membrane Verification:

6.1 This Report is limited to the verification of the gas resistant membrane/vapour membrane/radon barrier after installation and no inspections were undertaken of the substrate (i.e. prepared ground). The Report therefore does not constitute as a full verification of ground gas protection system.

6.2 The comments given in this Report and the opinions expressed, are based on the condition of the ground gas membrane as encountered at the time of inspection by suitably qualified personnel. RSK cannot accept liability for any subsequent change to the status of the gas membrane by follow-on trades or other construction activity.

6.3 Where not designed by RSK, the verification of protection measures is carried out with reference to the gas protection design provided by the Client. RSK assume the scope of gas protection measures as determined by third parties to be correct and to have achieved any required approval from authorities.

6.4 The Ground Gas Design Report/Remediation Strategy and Verification Plan contains details of the procedures to be adopted for inspection and validation of the works. However, it should be noted that responsibility for the correct implementation of the strategy lies with the appointed contractor. RSK cannot be held responsible for any remedial works that are carried out without the agreed procedures involving either direct supervision by RSK, or inspection and validation of the works by a representative from RSK.

7. Service Constraints for Environmental Due Diligence (EDD) Reports:

7.1 The comments given in this Report and the opinions expressed are based on the information obtained and reviewed as part of the desk-based assessment. However, there may be conditions pertaining to the Site that have not been disclosed by the assessment and therefore could not be taken into account. Furthermore, no intrusive investigations, monitoring or sampling have been undertaken to confirm the environmental status of the site, therefore any comments relating to ground conditions and subsurface contamination are based solely on a review of desk-based information.



7.2 This Report describes the results of the EDD exercise. The scope of this EDD Report, where appropriate, covers legal or regulatory compliance with respect to UK or international regulations associated with environmental matters.

7.3 As with any EDD exercise, there is a certain degree of dependence upon information provided by the target company. The EDD does not include a site walkover / visit or liaison with site representatives unless identified in the Services. Therefore, the assessment is based on the available desk study information. Also, there is a certain degree of dependence upon oral information provided by site representatives, which is not readily verifiable through visual inspection, or supported by any available written documentation. RSK shall not be held responsible for conditions or consequences arising from relevant facts that were not fully disclosed by facility or site representatives at the time this EDD exercise was performed.

7.4 This Report, including all supporting data and notes (collectively referred to hereinafter as "information"), was prepared or collected by RSK for the benefit of its Client.

7.5 The comments given in this Report and the opinions expressed are based on the information obtained and reviewed as part of the desk-based assessment and the site inspection visit. However, there may be conditions pertaining to the Site that have not been disclosed by the assessment and therefore could not be taken into account. Furthermore, no intrusive investigations, monitoring or sampling have been undertaken to confirm the environmental status of the Site therefore any comments relating to ground conditions and subsurface contamination are based solely on a review of desk-based information and observations collected during the site inspection visit.

8. Service Constraints for Ground source heat energy Reports:

8.1 It is understood that this is a desktop survey only and that there are no requirements for a site walkover, service utility survey, or provision of service plans. These services can be provided upon request if required.

8.2 At a later stage, it is possible that a thermal response test (TRT) will need to be completed, for which a test borehole will have to be drilled, and these would be costed at the time. RSK can provide all aspects of subsequent site work for a GSHP system if required.

9. Service Constraints for Water Abstraction Borehole Reports:

9.1 The Report aims principally to only identify and assess the suitability of the site for a water abstraction borehole. This Report should be considered in the light of any changes in legislation, statutory requirements, and industry practices, that have occurred subsequent to the date of the Report.

9.2 Unless stated in the Report, the opinions expressed in this Report including all comments and recommendations provided are on the basis of the information obtained from a desk-based assessment.