TRTWP549 OWNER: AREA SCIENTIST

Wessex Water Bioresources Centres

Waste Pre-Acceptance, Acceptance and Rejection Procedure

1. Introduction

This waste pre acceptance, acceptance and rejection procedure should be read alongside the Bioresources Centres (BC) Site Specific Waste Management Plan (see Related Documents) which includes details on the scope of the procedure and operations of the site.

Currently, this procedure covers waste pre acceptance, acceptance and rejection procedures for waste received for anaerobic digestion (AD) at the following Bioresources Centres (BC) within Wessex Water: Poole and Trowbridge. This document will be revised to include Berry Hill, Taunton and Avonmouth in the future.

This procedure has been prepared in compliance with the Environmental Permitting Regulations 2016, the Best Available Techniques (BAT) Conclusions and BAT Reference Document for Waste Treatment (BREF).

In addition, our procedures take into consideration guidance produced by the Environment Agency on 'Biological waste treatment: Appropriate measures for permitted facilities' (September 2022).

All of the waste received is produced and treated by the same operator – Wessex Water Services and the waste type is well known and controlled. Therefore, the applicability of preacceptance and acceptance procedures are low risk in terms of process safety, occupational safety and environmental impacts.

1.1 Waste Accepted

Each Bioresources Centre will accept sewage sludges produced by the Urban Waste Water Treatment (UWWT) stream from Wessex Water (WW) facilities only. These non hazardous waste water sludges originate from smaller origin water recycling centres (WRCs) across the region of Wessex Water Services (imported sludges). In addition, each BC also accepts primary and biological sewage sludge produced from the adjoining WRC (indigenous sludges).

We do not accept any commercial waste or waste that would result in co-digestion at the BC. Only sludges described in the table below are accepted into the permitted area.

All movements of imported liquid sludge are undertaken by WW's own fleet of tankers under the management of the Tanker Desk. Imported waste must be delivered in an appropriate tanker that can discharge safely into the sludge import tank.

Table 1 provides a summary of the wastes accepted at the AD facility by waste stream, EWC code and origin.

Table 1

Waste Streams	EWC Codes	Origin
Indigenous Sludge	19 08 05 sludges from treatment of urban waste water	5 5 5

ISSUE NO.1
September 2023

TRTWP549 OWNER: AREA SCIENTIST

Imported Sludge	19 08 05 Sludges from treatment of urban waste water	Sewage sludge arising from other Wessex Water WRC's
	19 02 06 Sludges from physico/chemical treatment other than those mentioned in 19 02 05 (sewage sludge only)	
	19 12 12 wastes from mechanical treatment of wastes other than those mentioned in 19 12 11 (sewage sludge only)	

Infrequently, a BC maybe asked to accept raw sewage sludge (19 08 05) from UWWT streams from sites controlled by other Water Companies. The pre-acceptance criteria and analysis below will be followed.

Each BC does not accept hazardous, 'mirror-entry' hazardous or bespoke waste streams. Any new or unusual requests are assessed using the below criteria and if these fail Section 2 requirements below then the rejection procedure is used, and the load is not discharged.

WW has control of the sludge stream from the point of production at the origin sites through to the acceptance and treatment at the BC.

The principal types of sludges processed at the BC are:

- 1. Primary sludge primary settling tanks High organic content >75%
- 2. Chemical precipitation primary sludge: Primary sludge from settling tanks chemically dosed with iron salts to aid phosphorus removal, usually 70% organic content
- 3. Surplus activated sludge Excess sludges from activated sludge process 75% organic content or higher
- 4. Humus Sludge Sludge settled following trickling filters, 75% organic content or higher
- 5. Sludge liquors Usually less than 1% solid matter from sludge treatment.

Imported sludges to the BC are typically in the range of 1% to 8% dry solids and most commonly between 3% to 6% dry solids.

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Waste Pre-Acceptance Procedure

2. Pre-Acceptance Procedure and BIOF037

Waste accepted will be limited to raw sewage sludges arising from WW facilities only (indigenous and imported). Each incoming waste stream will be subject to pre-acceptance checks and the following details will be recorded:

- Source of waste, including the location and WW site name
- Description of waste (e.g. sewage sludge arising from a WW WRC)
- What process has produced this waste
- Physical form and transport details (e.g. sewage sludge transported via tanker)
- Estimated volumes annually expected to be imported into the BC
- How will the waste vary over time (e.g. seasonal variations, trade changes)
- EWC code of the waste
- Representative characterisation analysis as per the list in BIOF037

Pre-acceptance checks will also include consideration of any deviation from typical incoming WW WRC wastes including, but not limited to:

- Increased odour potential
- Oil Contamination heavily contaminated waste will be classed as hazardous and not accepted by the facility
- · Visual check of the colour of the waste, to check it appears as it normally would
- Age of waste older waste may have an increased septicity which can affect the anaerobic digestion process. Indigenous sludges are typically a lower sludge age than imported, ranging from a few hours old up to 10 days in normal operation. Imported sludges are usually anywhere from one day up to several months old. The sludge age is important as it can lower the sludge calorific value and affect digester health and the amount of biogas that is generated. It is worth noting that the smaller sites that are likely to have older sludge will have far smaller volumes of sludge overall and therefore the impact on the digesters will be lower. As well as providing information on the age of waste we carry out an additional check of pH of the waste to give an indicator of septicity. This is tested for at pre-acceptance and additional checks are carried out at the acceptance stage.

These factors will be considered to ensure the incoming waste can be treated effectively and ensures no additional environmental risks or nuisance.

All of this information is recorded in form **BIOF037**.

2.1. Waste Sampling and Characterisation

Each BC currently accepts sludge from origin sites or WRC's across the Wessex Water region. The sludge is deemed to be consistent and therefore samples for waste characterisation will be carried out on a risk based approach. This is explained further below.

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Additional characterisation of wastes will be carried out for any new origin sites being imported into the BC.

In line with guidance in Appropriate Measures, Section 6.1.13: If the customer has a number of containers holding the same waste, you can apply the industry standard applying the square root of (N)+1 rule to sampling those containers.

Example - Poole

Poole has 13 origin sites, the square root (N)+1 = 3.74. Sludge samples will be taken from 4 of the origin sites that import into Poole per year.

Table 2. Wessex Water Bioresources Centres

Site	No. of origin sites	Square root of (N)+1=	Samples required per annum
Poole	13	3.74	4
Trowbridge	63	8	8
Berry Hill	20	4.58	5
Taunton	29	5.47	5
Avonmouth	25	5.09	5

The area scientist will identify the new sites to be sampled in line with table 3 below and initiate the characterisation. For BCs with more origin sites a higher number of characterisation samples from each range will be taken each year.

A risk-based approach is undertaken to determine the pre acceptance sampling sites, for example with a focus on sites that have higher trade effluent inputs in the incoming sewage or for sites producing large quantities of sludge by volume to be sent to the BC. These sites potentially carry greater risk in terms of impact on AD operations and therefore it is important to understand their waste characteristics.

Table 3.

WRC size P.E	Trade effluent in WRC	No. of characterisation
	catchment	samples (per year)
Low (<10,000)	No	0-2
Medium (10,000 - 50,000)	Yes	1-3
High (>50,000)	Yes	2-4

n.b. A low p.e. WRC with trade effluent will use the medium p.e. line

Raw sewage sludge from other Water Companies will use the high p.e. line

Sampling is undertaken by appropriately trained Site Operators or Scientists and tested at our internal UKAS accredited laboratory with some analysis also completed at a third party laboratory (if required) with a documented management system accredited to ISO 17025.

Samples taken will be representative and taken in accordance with our internal sampling procedure and as set out below. Sampling techniques may be adjusted in order to ensure representative samples are collected. For example, when:

• Seasonal variation may affect the composition of the incoming waste samples.

All samples are registered for the determinants listed in the BIOF037 form.

Sludge will be sampled from the holding tank connected to the tankering point so a representative sample of what an origin site is producing is obtained. Ideally, the tank is mixed first and a dip sample taken below the surface layer. If a sampling tap is available this will be run for 30 secs to clear the pipe prior to taking the sample.

Sampling and measuring equipment should only be used for this purpose to avoid the risk of sample contamination.

Area scientists are responsible for providing notification to operators to carry out the sludge sampling for characterisation. They provide the following information:

- Sample label details and pot types
- The number of samples and approximate dates to be collected
- The sites selected
- What sampling location to use

Samples are transferred by internal courier to our internal UKAS accredited laboratory and the results are transferred via LIMS (Laboratory Information Management System) into the Scientific Systems software. The results are initially reviewed by the Area Scientist who can involve the Compliance team in further assessment. All results are also held on the company online SharePoint.

This testing will also provide useful information that will enable WW to monitor the consistency and variability of waste from different origins.

Information on the characteristics of the waste will be obtained prior to acceptance of the waste at the BC. This information is to allow us to gain an understanding of whether the waste received may have an impact on the quality of the outputs.

The following table provides an assessment of the characteristics of the waste we will assess at pre-acceptance and what their potential impact might be on the digestion process if left unchecked.

Table 4

Parameter	Acceptable Range	Impact on Process / Reason for Sampling
Physical Contaminants (e.g. rags)	Dependent on site and screening capacity.	During pre-acceptance and acceptance tests we look at physical elements of the sludge, such as particle size distribution and the presence of rags. Rags can lead to blockages and be detrimental to the AD process. It should be noted that all imported sludge will be input through a screening system that

ISSUE NO.1
September 2023

TRTWP549 OWNER: AREA SCIENTIST

		should prevent rags entering the AD process
рH	5-9	During pre-acceptance tests we check the pH of origin sites. In addition, we check the pH of tankers at acceptance stage at the BC. Sewage sludges are usually slightly acidic. The typical range we would expect to see is 6.5-8
		Most microorganisms prefer a neutral pH range. Methanogens are very sensitive to pH and prefer around 7 for their highest performance. Hydrolytic and acidogenic bacteria perform better between pH values of 5.5 and 6.5. Acidogenic bacteria are more tolerant to a larger pH range. Maintaining an optimum pH for all microorganisms in the same digester is challenging, especially for substrates with varying compositions like sewage sludge.
Potentially Toxic Elements (PTEs) Heavy Metals		During pre-acceptance tests we analyse for copper, nickel, zinc, cadmium, chromium and lead amongst other metals. In addition, we analyse for metals in digester feedstocks periodically.
		These kinds of metals can be inhibitory and toxic under certain conditions in the AD process, depending on their concentrations.
Ammonia and Total Nitrogen		During pre-acceptance we analyse for ammonia and total nitrogen. In addition, we analyse for ammonia in digester feedstock periodically.
		Ammonia may inhibit methanogenesis during the AD process if it is in high concentrations
Colour		During acceptance we carry out visual checks of the sludge at the origin site and at the BC to ensure the colour is within the expected / usual range

Further to Table 4, the individual characteristics that we will assess at our internal UKAS accredited laboratory are listed in the BIOF037 form and include those in Table 5 below.

Table 5.

Composition	
% Dry Solids	
% Volatile Solids	

Volatile Fatty Acids
pH (Required range 5 to 9)
Ammonia
Total Nitrogen
Total Phosphate
Total Organic Carbon (TOC)
Acid Soluble Fluoride
Total Sulphur
Magnesium
Alkalinity
Potassium
Iron
Molybdenum
Arsenic
Chromium
Copper
Lead
Nickel
Selenium
Zinc
Cadmium
Mercury
Calcium

TRTWP549 OWNER: AREA SCIENTIST

These parameters will provide information on the composition of the sludge and alert WW to any contamination or toxicity that may cause it to be unsuitable or inhibit biological activity. These parameters have been selected as the most relevant to sewage sludge because they have the greatest potential to impact on the digestion process and on the quality of the digestate.

As detailed above the BIOF037 form incorporates extensive checks at the pre-acceptance stage, ensuring that thorough checks are made prior to wastes being accepted at the BC for treatment.

The waste pre-acceptance assessment is repeated if:

- The waste changes
- The origin site process changes and gives rise to changes in the waste
- The waste received does not conform to the pre-acceptance information
- There are significant changes to trade effluent sources at the origin site

2.2. Origin Site Sampling

WW's knowledge of incoming wastes to the BC for treatment is expanded by our internal sampling programme at the origin sites. Each month samples are taken at the origin sites and tested at our internal UKAS accredited laboratory for the following:

- %DS
- pH
- ammonia
- phosphorus
- nitrogen

This monthly sampling allows us to maintain a continuous picture of site performance and accounts for any seasonal variations. Operationally, sludges will only be accepted from origin sites where the sludge is healthy as indicated by the above monitoring of the raw sludges at each WRC. WW's Scientists will review this sample data and if any concerns are raised an assessment will be undertaken to determine the appropriate course of action.

2.3. Pre-acceptance analysis

Sampling will take place on any new streams to be imported into the BC, and as above we will carry out pre assessment analysis on an annual basis at the required number of sites. These sites are chosen on a risk based approach (as described in Section 2.1).

The frequencies are based on the size of the WRC and whether trade effluent is permitted in the WRC catchment. The maximum frequency will be used for all raw sewage sludge imports from other Water Companies.

The full list of determinands are listed in Table 4 above and the BIOF037 form.

It is important that an understanding of how the sludge will affect the digestion process and the end digestate at the BC is obtained.

2.4. Pre-acceptance completion

The pre acceptance information is correlated, reviewed and accepted by the Operations Site Scientist using the <u>BIOF037</u> recording form. The tanker desk then records details of the sites on TranSend as per <u>TRTWB003</u> sludge scheduling procedure. Once this is completed loads are managed using the acceptance procedure and TranSend.

2.5. Record keeping

Records of the WRC Pre acceptance <u>BIOF037</u> form are kept for 3 years and are held on the corporate Sharepoint. Individual sample results are held on the Laboratory Scientific Systems database.

The information held in accordance with this procedure is reviewed annually.

TRTWP549 OWNER: AREA SCIENTIST

Commented [CD1]: Tricky again - do you have the origin site list? I've just done a quick Qilkview search for 2022 and 2023 - not much.... I'd argue that statement isn't good

Commented [CD2]: Yes we'll need to.

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Waste Acceptance Procedure

3. Acceptance Procedure

Wastes will only be accepted once pre-acceptance criteria have been met and recorded using the form <u>BIOF037</u>. Only pre-approved waste managed on Transcend can be booked into site using <u>TRTWB003</u> sludge scheduling procedure.

Emergency tankers can be accepted into site and have to follow the procedure response to request for wastewater emergency tanker (<u>ROCP114</u>). The Tanker desk manage these requests and knowing the age, origin, the EWC code and description of the waste can record the movement on Transcend, including checks that it matches information obtained at the preacceptance stage.

If the Tanker desk determine the requirement is for hazardous waste or oil etc, they will identify an external specialist tanker firm to remove the waste.

The AD facility at the BC treats only sludges arising from WW WRC sites. These are known sources and the waste will be consistent in its characteristics. Only on rare occasions will waste need to be rejected. In accordance with Section 6.8 of guidance produced by the Environment Agency on 'Biological waste treatment: Appropriate measures for permitted facilities' (September 2022), acceptance sampling requirements do not apply to sewage sludge and septic tank sludge. Instead, visual checks and periodic audits against pre-acceptance characteristics will be undertaken.

3.1. Acceptance Checks

At origin site:

A visual inspection of feedstocks is carried out by the tanker driver at the origin site. The sampling will be done by the tanker driver at the tanker during the loading from the feed line. This will check for any unusual malodours and visual appearance differences, to confirm the waste is consistent with agreed pre-acceptance parameters.

The tanker driver does the assessment. They are trained and competent to undertake the visual and odour check.

Visual Assessment:

Rejection of waste if:

- Darker colour than usual / unusual colour
- Heavily contaminated with oil

Odour Assessment:

Rejection of waste if it:

• Has a different / unusual odour suggesting the waste is septic or has other contamination

TRTWP549 OWNER: AREA SCIENTIST

At the BC:

In line with guidance in Appropriate Measures, Section 6.1.13: If the customer has a number of containers holding the same waste, you can apply the industry standard applying the square root of (N)+1 rule to sampling those containers.

Example – Poole

As there are approximately **9** tankers a day imported into Poole BC, applying the square root of (N)+1 = 3.16. Therefore, 3 tankers a day will have visual checks carried out once they arrive at Poole. These checks will be carried out under the supervision of a suitably qualified operational team member.

Table 6. Wessex Water Bioresources Centres

Site	No of tankers a day	Square root of (N)+1=	No of tankers a day requiring visual checks
Poole	9	3.16	3
Trowbridge	22	4.80	5
Berry Hill	TBC	TBC	TBC
Taunton	TBC	TBC	TBC
Avonmouth	TBC	TBC	TBC

The checks include:

- Visual assessment
- Odour assessment
- pH test

Visual Assessment:

Rejection of waste if:

- Darker colour than usual / unusual colour
- Heavily contaminated with oil

Odour Assessment:

Table 7 gives a rating and description of the odour assessment of the waste. It also provides actions for the operational team member to carry out.

Waste is rejected if it:

• Has a different / unusual odour suggesting the waste is septic or has other contamination

Table 7.

Number			Report to/approval required
0	Normal/as expected	Yes	No

TRTWP549 OWNER: AREA SCIENTIST

1	Slightly stronger than normal	Yes	No
2	0 1 , 0	required.	Treatment Centre Supervisor or Manager

pH Test

If the pH falls outside the expected range of 5-9, the Site Scientist will assess the waste and once all checks are completed will decide if the waste is to be rejected.

3.2. Waste Reception

Waste acceptance into the BC is via a key fob and logger system which all tanker drivers are trained in using. The Rotork valve will only open to allow discharge into the sludge import tank upon presentation of a valid tag for the tanker volume. The key fobs are pre-programmed by the Tanker desk. This prevents any unauthorised loads being discharged into the BC.

The logger records:

- The date and time of discharge,
- the origin site,
- which tanker was used,
- volume,
- waste type i.e. sewage sludge
- tanker driver,
- %DS

All of the above information is transferred to 'Transcend' the software used for tanker movement recording. The site specific Best Tanker Practice documents can be linked to in Related Documents below. These provide additional information for tanker drivers.

Imported sludge is off loaded from the tanker into import sludge holding or reception tank(s). All loads being offloaded are controlled by the logger control system. The discharge pipe for the logger point has an actuated Rotork knife valve that opens when the key fob is inserted into the logger control system enabling the tanker to discharge to a holding or reception tank.

All imported sludges are screened to remove rags and inorganic debris from the imported sludge and prevents this material entering the digestion treatment process.

All sludge tanks have level monitors and inhibits to prevent spillages from any over filling. The levels are also connected to telemetry to alarm and notify site operations if there is an issue.

3.3. AD Feedstock Sampling

Representative samples will be collected of the thickened blended AD sludge feed. Samples will be analysed by our internal UKAS accredited laboratory. The recommended analytical suite may be amended following a review of the pre acceptance information provided or based on previous known characteristics of the waste stream.

Imported sludges to the BC are typically in the range of 1% to 8% dry solids and commonly between 3% to 6% dry solids.

All sludges mentioned in Table 1 are monitored through a logger to ensure the provenance and characteristics of the waste. Only sludges from WRCs owned and operated by WW are discharged in the Permitted area.

Seasonal variation may affect the composition of the incoming sludges. Sludge age e.g. older waste may have increased septicity.

WW understands that the characteristics of and mixing of liquid sludges will influence the anaerobic digestion process and therefore, all digestion processes on site are routinely monitored and sampled as listed in Table 8.

Parameter	Unit	Frequency	Method
Import Feed Volume	m3/day	Daily	Logger
Import Feed Suspended solids	% dry solids	Daily	Logger
Digester feed volume	m3/day	Daily	SCADA
Volatile Matter of Feed (if AD)	%VS	Weekly	Manual sample / Lab
Volatile Matter of Digesters (all sites – APD & AD)	%VS	Weekly	Manual Sample / Lab
Biogas Production	Nm3/day	Daily	SCADA
Hydraulic Retention time	HRT (hours)	Daily	Calculated
Temperature of Digesters	Deg C	Daily	SCADA
Digester Dry Solids	% dry solids	Weekly	Lab
Digester Outlet volatile matter	%VS	Weekly	Lab
Metals		Monthly	Lab
Ammonia	mg/kg DS	Weekly	Lab
рН	-	Daily / Weekly	Lab
Alkalinity	mg/l	Weekly	Lab
VFA	mg/l	Weekly	Lab
OLR	kgVS/m3/day	Weekly	Calculated
CH4 within gas production	%	Weekly	Manual Sample

Table 8.

Commented [CD3]: Yes please

ISSUE NO.1 September 2023		TRTWP549 OWNER: AREA SCIENTIST	
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O2 within gas production % Weekly Manual Sample Please note, online instruments (such as flowmeters, temperature probes) used for monitoring of the digesters are calibrated annually.

If the digestion site experiences microbiological non-conformance with its HACCP Plan (Hazard Analysis and Critical Control Plan) or digestion feedstock changes are found, this suggests possible changes in sludge characteristics from the origin sites. Subsequently, an investigation into additional non-audited origin sites will be completed, focusing on sites which have undergone recent significant process changes.

3.4. Waste Transfer Notes

As sludge imports are transferred as internal movements between WW sites using Wessex Water tanker fleet; season tickets are used, and individual waste transfer notes are not generated.

Wessex Water has an upper tier waste carrier registration maintained by the Wastewater Compliance team: Reference: CBDU96562.

Waste Rejection Procedure

4. Waste Rejection Procedure

Where waste arrives at site and is not acceptable it will need to be rejected.

Rejection criteria include:

- Logger process is not operating (booking via Tanker Desk has not taken place).
- Waste Transfer Note (WTN) is missing, incomplete or contains errors (NB a Season Ticket is a type of Waste Transfer Note).
- Waste is a hazardous waste.
- Site closure, maintenance, breakdown or bad weather.
- Failed to book the load in advance and the site is unable to accept it.
- Waste has not been through the pre-acceptance and acceptance procedures (except emergencies).
- New waste stream that has not gone through the pre-acceptance assessment.
- Load has failed any of the visual and odour checks carried out at the origin site or at the receiving BC.
- Load does not meet all of the pre-acceptance criteria as per BIOF037.

The above list is not exhaustive. Further unambiguous rejection criteria may be acceptable.

When a tanker of waste has to be rejected for one of the reasons above, the waste will be quarantined within the tanker, and will not be unloaded to site. The tanker will then be removed from the BC.

TRTWP549 OWNER: AREA SCIENTIST

4.1. Rejection process

All loads are booked in via TranSend and managed through the tanker desk; the tanker desk shall be responsible for arranging alternative routes for any rejected loads in collaboration with the Area Scientists.

The BC does not currently accept any wastes from 3rd parties (unless it is from other Water Companies), but where a 3rd party waste is rejected it will be for the 3rd party to identify and agree a new acceptable treatment location.

4.2. Hazardous waste

No hazardous wastes are included on the site permit so no wastes should be able to be booked into site. If a hazardous waste arrives and needs to be rejected, then in addition to the above process, a new consignment note is generated, as per guidance on the GOV.UK website (link below) and the waste carrier will need to contact the Environment Agency.

Hazardous waste: rejected loads guidance

If hazardous waste arrives without a consignment note (including with a Waste Transfer Note) then a written explanation of the rejection must be provided to the carrier that includes:

- The reason for rejection of the waste
- The description or classification of the waste, if known
- The names of the producer, holder, consignor and carrier
- A consignment note code you assign in the format REJECT/XXXXX where 'XXXXX' is any 5 letters or numbers you use to give the load a unique code

Wessex will then need to:

- Keep a copy of the explanation in our records
- Give one copy to the carrier
- Send a copy to each of the producer, holder and consignor (they may be the same) as soon as you can
- Use this information for returns to the Environment Agency and to the waste producer or holder

Speak to the Wastewater Compliance team and see <u>ENVWG003</u> for more guidance on consignment notes.

Document changes

If any changes are made to this document, please inform the Regional Odour Process Scientist.

Revision history

Issue Date Description Prepared by	
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ISSUE NO.1		
September 2023		

TRTWP549 OWNER: AREA SCIENTIST

1	June 2022	First issue	Mike Foley
2	May 2023	Second Issue – Revision to incorporate TRTWP534 and TRTWP535 to reflect Schedule 5 requests	Rebecca Lamb Hafedh Benamor
3	September 2023	Third Issue – Revision to make a generic document to apply to the 5 BC's rather than a site specific document. New document reference TRTWP549	Rebecca Lamb

Related documents:

The management of residues produced by the BCs are covered in the following residues plans:

Poole TRTWP533.

Trowbridge TRTWP550

Avonmouth TRTWP540

Waste Management Plans:

Poole - <u>OPSP277</u> Trowbridge - <u>BIOP011</u> Berry Hill - <u>BIOP015</u> Taunton - <u>BIOP019</u> Avonmouth - <u>OPSP343</u>

Tankering:

Sludge Scheduling Procedure <u>TRTWB003</u> Response to Request for Wastewater Emergency Tanker (<u>ROCP114</u>)

Best Tanker Practice:

Poole - <u>TRTWG768</u> Trowbridge - <u>TRTWG801</u> Berry Hill - <u>TRTWG730</u> Taunton - <u>TRTWG818</u> Avonmouth - <u>TRTWG744</u>

Other:

How to complete a Hazardous Waste Consignment Note ENVWG003