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1. Introduction

The purpose of this document is to define the procedure to be followed when pre-assessing a waste enquiry within the Technical Department. The procedure will be implemented to ensure enquiries are subject to appropriate technical appraisal in broad alignment with Section 2.1.1 of the Environment Agency Sector Guidance Note IPPC S5.06.

The Environment Agency further published Clarification of the Requirements in 2.1.1 of Sector Guidance Note S5.06: Pre-Acceptance of Waste. Within this they state that:

“Rigorous pre-acceptance is critical to the safe management of wastes. In order to prevent the acceptance of unsuitable wastes which may lead to accidents, adverse reactions or uncontrolled emissions, systems and procedures must be in place to ensure that wastes are subject to appropriate technical appraisal before delivery to site.”

This procedure has been set out to ensure that we meet the EA’s over-riding objectives within the guidance by adopting a risk-based approach to Pre-Acceptance

These objectives are:

- All enquiries will undergo a formal pre-acceptance assessment.
- All enquiries will be requested in writing to provide a clear communication record.
- All waste streams that require further investigation will be investigated and, if necessary, will be sampled and analysed prior to furthering the enquiry.

- All wastes failing at any step of the pre-acceptance assessment will be declined and will not be factored in any subsequent quotations, unless action is taken to resolve the reason(s) for failure.
- Only wastes passing the pre-acceptance assessment will be quoted for, thus ensuring safe management in terms of future waste acceptance in that only permitted wastes with known chemical constituents and with clearly recognised onward disposal routes are quoted.

2. Intended Audience

- All members of the Technical Department
- Transfer Station Manager and Deputy
- Reception Chemists

3. Background to Enquiry Initiation

The Technical Department receive initial waste enquiries in a variety of formats; principally telephone, fax, email and via other representatives within the Company. These enquiries are mainly, but not exclusively for wastes that could be accepted at our Hazardous Waste Transfer Station (Permit Reference WP3231SX). Other in-house facilities that could be considered include the Colnbrook Waste Incinerator and the Wingmoor Farm Treatment Plant and Hazardous Waste Landfill. The latter two facilities are covered by a specific pre-acceptance procedure (SO/TD/GEN/007). Wastes could also be assessed and quoted for direct disposal at a number of third party facilities.

Initial telephone enquiries are quite likely to be initially received by a member of the Technical Department administration team. Callers must be encouraged to put their enquiry in writing and a number of forms have been developed to assist customers in providing this information. These quotation request forms (QRFs) are accessed via Technical H: Office, Pre Acceptance Forms, Quotation Request Forms. They cover the following enquiry types and are designed to meet the information gathering stage of pre-acceptance.

- SO/TD/GEN/002b Generic Quotation Request (TD/QRF001)
- SO/TD/GEN/002c Fridge Quotation Request (TD/QRF002)
- SO/TD/GEN/002c Gas Cylinder Quotation Request (TD/QRF003)
- SO/TD/GEN/002g Computer, Electrical Equipment Quotation Request (TD/QRF006)
- SO/TD/GEN/002h Light Bulbs/Tubes Quotation Request (TD/QRF007)
- SO/TD/GEN/002j Skip Quotation Request (TD/QRF009)
- SO/TD/GEN/002k Tanker Quotation Request (TD/QRF010)
- SO/TD/GEN/002l Tyre Quotation Request (TD/QRF012)

If callers are unwilling to follow the procedure and place the enquiry in writing, they should be put through to a member of the Technical Sales or Management team. Discussions can be continued and guide pricing **ONLY** can be provided. It must be made very clear to the enquirer that this verbal guide price can only be confirmed formally at a later date, if the full pre-acceptance procedure is followed.

Email and fax are commonly used as the first point of enquiry. Often, the initial communication will not provide enough detailed information to meet the requirements of pre-acceptance and therefore quotes cannot be issued. In these instances, further information has to be sought. This can be achieved by email and or telephone. Often the latter can prove more fruitful as more detail can be obtained as the discussion develops, resulting in greater knowledge being gained about the specific enquiry. However, the outcome of all discussions must be logged, using the Waste Enquiry Pre-Acceptance Form (SO/TD/GEN/002a).

4. Waste Enquiry Pre-Acceptance Form

The Waste Enquiry Pre-Acceptance Form is a pre-requisite for this procedure and **MUST** be used for every new sales enquiry. The only exceptions to this are emergency clearances of flytips and emergency service callouts.

No formal quotation will be issued unless the assessment receives sign off from an Authorised Technically Competent/Experienced and Qualified Member of Staff.

Note: It is advisable to print out and handwrite this form, as it is highly likely that the form will only become completed following a number of interactions with the potential customer.

The purpose of the form is to enable the originator to take a stepped, measured approach when undertaking a technical appraisal of a new waste enquiry. This form acts as the summary of all communication, research and appraisal (**NB**** see below) and it is designed to ensure the following:

- Waste enquiries have been assessed fully and that we have clear written records that demonstrate we know what the waste(s) and the hazards associated with it are.
AND
- We have identified a suitably permitted disposal facility for the waste.
AND
- We have logged a summary of this appraisal on the form, demonstrating that due consideration has been given to the hazards and risks associated with the wastes. Completion and authorisation of the form enables the enquiry to proceed to the formal quotation stage in full confidence that, if accepted, we can safely and compliantly manage the waste disposal transaction, as only manageable, permitted wastes are quoted for.
OR
- If when completing the form we are unable to demonstrate all of the above, we must either decline to provide a quotation, or undertake further research or sampling, until we can confidently characterise the waste and locate a compliant disposal facility to accept it.

There are several different mechanisms that can be used to obtain the information necessary to assess an enquiry and it is the responsibility of the authorised person to decide which mechanism is required to obtain the necessary details.

Any combination of the following sources of information can be used and it is these that must be summarised on the Waste Pre-Acceptance Assessment Form:

NB**

1. Receipt of a detailed email.
2. Receipt of a detailed fax.
3. Obtaining a written declaration from the customer using the appropriate form.
4. Obtaining a signed SO/TD/GEN/006a Lithium Battery Acceptance Procedure Form.
5. Receipt of a corresponding laboratory analysis.
6. Receipt of the relevant safety materials data sheet.
7. Receipt of a waste control form or pre-treatment waste control form.
8. Notes gathered during an inspection of the waste by a suitably competent person from the Technical Department.
9. Confirmation of the ability to accept and process from the Transfer Station Manager.
10. Relevant photographs.

5. Definition of those deemed Technically Competent to Complete the Form and Approve the Form

Further information gathering/technical appraisal becomes the responsibility of **Technically Competent and Experienced** staff members and only they are authorised to **originate** a form. To qualify as such, staff must have experience, both in the disposal sites PPC permits and have a good understanding of the legislative framework governing the management of hazardous wastes.

Authorised Members of Staff are the only staff members who can approve and authorise a pre-acceptance form, thus authorising a quotation to be generated by the sales and administration teams. To become an authorised member of staff, both qualification and experience are considered to be important. The minimum qualification pre-requisite for such a staff member is an HNC, or equivalent in a Science based subject.

It could be possible for an Authorised Member of Staff to originate a form, however, they cannot sign off the form themselves. They must seek an alternative authorised signatory to verify the form. This ensures a thorough check is undertaken, thus reducing the potential for over-sites.

Only once a Pre-Acceptance Waste Enquiry Form has been approved by an Authorised Signatory can the enquiry proceed to the quotation stage.

6. Technical Compliance Administrator – Record Management

If a quotation is subsequently accepted, the Technical Compliance Administrator will undertake a further pre-acceptance verification check. Their role is to verify that all internal procedures are being complied with, including this Pre-Acceptance Procedure.

If, upon verifying against this procedure, the Compliance Administrator finds any deviation from the procedure, they must identify this with the signatory that approved the pre-acceptance form and the job must be put on hold until the issue can be resolved.

The Technical Compliance Administrator will be responsible for ensuring all records are electronically stored within the Technical Department's Gatehouse operating system. At the quotation stage, each enquiry is allocated a unique 'T' reference and this forms the basis of our Waste Tracking System. The form, along with any supporting notes, emails, analysis, data sheets, etc, should be clearly appended to the enquiry.

The Waste Tracking System enables all Pre-Acceptance records to be accessed by the Hazardous Waste Transfer Station management, to enable cross-referencing and verification at the Waste Acceptance stage.

All third party waste is booked in to the facility, to provide the transfer station management advance notice of impending receipts. The compliance administrator will compile these records in advance and ensure these (and especially any large loads) are discussed regularly with facility site management. A written record is also provided for advance notice and planning and a daily record is issued to the facility to assist with Acceptance of waste. Furthermore, collections scheduled on Grundon vehicles are also logged on the Technical Department scheduling spreadsheet. This details collection schedules up to one month ahead, enabling the Transfer Station Manager to further determine the potential types and volumes of waste to be received over that period.

This all enables the facility to allocate appropriate resources for the consignments due over the following days. Furthermore, this assists with on-site waste volume control by providing advance need for booking the appropriate vehicles, and disposal slots at onward disposal facilities.

All records of pre-acceptance that resulted in waste acceptance will be kept for the duration of the Operating System, which is projected to be longer than the required 3 year minimum.

Pre-Acceptance records for enquires that are not accepted by the customer will still be kept, in that they are associated with the unique T number.

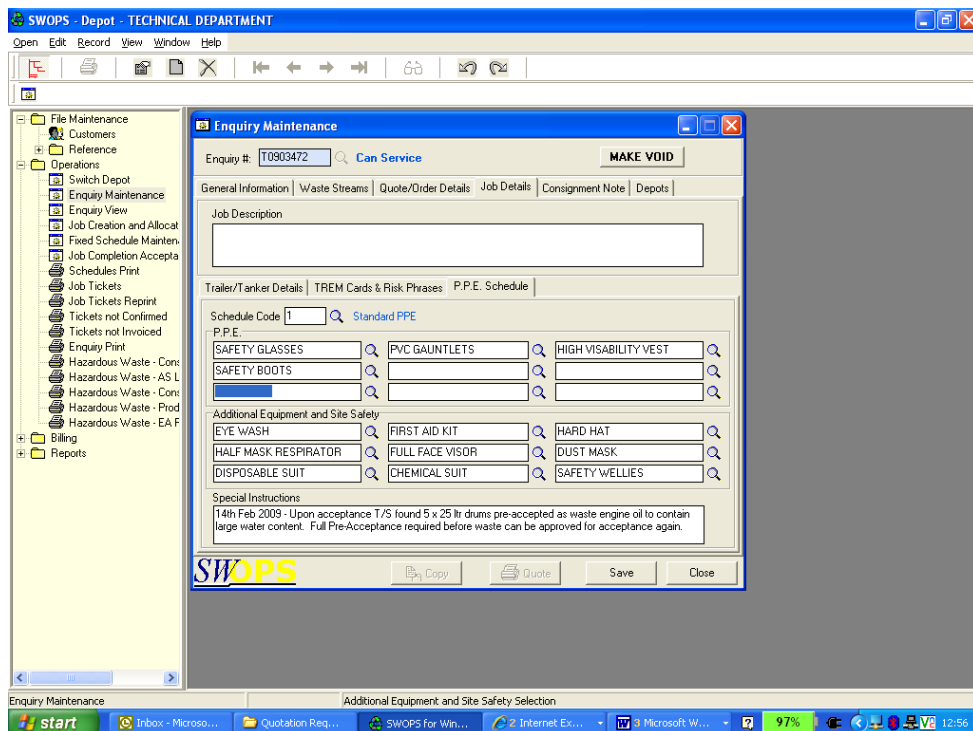
Records will also be kept for waste enquiries where the pre-acceptance assessment resulted in the waste enquiry being declined. These will be filed in date order in the *Declined to Quote* folder and will be kept for a minimum of one year.

7. Link to Non-Conformance System

This procedure is intrinsically linked to disposal facility acceptance procedures and their associated non-conformance systems. The Hazardous Waste Transfer Station undertakes thorough inspections of all incoming wastes and any irregularities with paperwork and / or waste inconsistencies are captured using these non-conformances on the Grundon Action Manager system. For further details refer to SO/TD/EWE/031. The non-conformance is directly traceable to the enquiry by virtue of the Waste Tracking System T reference.

If any non-conformance records are raised, these are passed from the Transfer Station Chemists and management to the Technical Office. Each non-conformance must be addressed and closed off on GAM, with the course of action taken.

The non-conformance must be appended to the Technical Department records by scanning and saving in Technical H: Office, Non Conformance Reports. Notes referencing the non-conformance details must also be added to the Special Instructions section of Job Details on the enquiry as below.



Any enquiry that results in a non-conformance will require full Pre-Acceptance to be carried out before that enquiry can be authorised again.

8. Repeat Consignments

Full Pre-Acceptance assessment need not be undertaken for historic repeat consignments of the same waste. The link here to Transfer Station Waste acceptance inspections and the non-conformance system is invaluable. With new enquiries and waste streams, if after the first five loads the waste proves to be 'consistent within a reasonable composition range' then full pre-acceptance assessment will not be required for a further year. The internal Transfer Station checks will highlight any problems during this time.

Therefore, repeat customer waste enquiries must undergo Full Pre-Acceptance assessment once per year. The Administrator and Transport Co-ordinator must ensure that enquiries approaching one year are brought to the attention of the Technically Competent and experienced personnel to re-assess the enquiry. **This full assessment must result in the original enquiry being voided and a new T number being allocated.**

9. Waste Specific Pre-Acceptance

9.1 Lithium Batteries

Enquiries that include primary cell lithium batteries must be assessed in accordance with this procedure and in full compliance with SO/TD/GEN/006a Lithium Battery Pre-Acceptance Procedure.

9.2 Pure Product Chemicals

MSDSs can be used to categorise and assess pure product chemicals. These have been defined in the EA's S5.06 clarification note as unused chemicals Unused is taken to mean not contaminated or diluted. Out of date or out of specification materials or products could be classed as unused as can a half empty drum (it is important that the reason for the material being out of spec is not such that this alters the composition of the product).

9.3 Lab Smalls

Enquiries relating to lab smalls (in containers of less than 5 ltr or less capacity) can be assessed upon receipt of a full list. Lab smalls generally contain pure chemical elements and compounds. A list alone is deemed sufficient to enable identification of the chemical, the hazards associated with it and any particular issues.

At the point of pre-acceptance assessment, it is the job of the technical assessor to ensure that sufficient caveats are included on the quotation to decline any wastes that are either not within the scope of the waste permit, or although able to accept by permit, are not wanted either due to safety or processing issues.

Wastes that may result in additional caveats and or exclusions may include concentrated acids, strong oxidisers, organic peroxides, water reactive and air reactive wastes, highly toxic substances such as cyanide wastes, certain pesticides, and wastes containing high concentrations of heavy metals, such as cadmium and mercury and wastes containing iodine.

9.4 Contaminated Clothing and PPE

For pre-acceptance it is necessary to determine what the contaminants on the clothing are. This is needed to characterise the waste and to ensure that we can safely manage it and send it to a suitably permitted facility.

9.5 Aerosols and Gas Cylinders

For the purposes of pre-acceptance, aerosols and gas cylinders can be categorised using data sheets where necessary. For regular wastes (e.g. butane gas cylinder) this requirement will not be necessary. However, role of the assessor is still to identify a suitably permitted facility to process such waste before the enquiry can progress to the formal quotation stage.

9.6 Waste WEEE and Lighting Tubes

The composition of WEEE items and light tubes, otherwise known as Articles, are considered to be sufficiently well known. Pre-assessment of such articles therefore needs to concentrate on meeting the management requirements of the facility, identified as suitably permitted to receive the waste and to gather enough information to facilitate the safe collection. Detailed analysis, hazardous component customer declarations or samples are therefore not normally required.

9.7 Asbestos Wastes

Asbestos wastes need no further assessment unless the waste is known to be contaminated with other substances.

It is recommended that:

- Cement Bonded Asbestos can be described as 10-15 % asbestos waste.
- Fibrous Asbestos to be described as 100% fibrous asbestos.

9.8 Wastes Deemed Suitable for Wingmoor Farm Treatment Plant and Hazardous Waste Landfill

This procedure need not be followed for waste enquiries that following initial appraisal are suitable for hazardous waste landfill, or for processing through the Wingmoor Farm treatment plant. Instead SO/TD/GEN/007 must be adhered to when pre-assessing such enquiries.

10. On Site Assessment, Sampling and Analysis of Waste

When completing the waste enquiry pre-acceptance form, whilst working through the pre-acceptance procedure, it may result in the need to undertake a site visit to gain a better understanding of the waste (s) the customer is wishing to dispose of.

This option should always be utilised when the desk based appraisal results in the inability to reach sign off on a waste enquiry form. This conclusion is usually reached when the customer is unable to provide a sufficient level of detail on the make-up and hazardous properties of their waste.

Technically competent members of staff experienced in hazardous waste disposal and the requirements of waste treatment facilities undertake site visits and assessments. Their expertise enables them to attend a customers' site to assess the potential waste collection and obtain sufficient information to characterise the waste(s). This can either be done by closely assessing the package(s) in consultation with the customer.

Information on the process producing the waste, the materials, the volumes, the packaging and the components and their hazardous nature can often be obtained in this manner. The information can be collated and logged on listing templates that are designed to capture all necessary information for compliant collection, transport and disposal (refer to SO/TD/GEN/002m Generic Hazardous Waste Listing).

When the Chemist/Assessor is unable to obtain a sufficient level of information by the methods previously detailed, there may be a requirement to obtain a representative sample of the waste, to enable further analysis and classification of the waste.

In such circumstances samples will be collected and analysed. Dependent on the nature of the waste the sample may be sent to an independent suitably accredited laboratory (conforming to ISO 17025 laboratory quality management standard) or to a waste treatment facility laboratory. The latter option is often utilised for bulk tanker collections, where the proposed treatment facilities' pre-acceptance procedure requires a physical sample for verification and approval, before they will issue a quote and or booking slot.

In the event that it is necessary to obtain a sample to assist in progressing the pre-acceptance assessment of an enquiry, the pre-acceptance form will clearly reference this and sign off will not be possible unless this has all been recorded. Sign off enables a quotation to be issued, as it confirms that we have assessed the waste to the extent that we know what it is and have an approved, permitted facility indicating they can accept the waste. All analysis, onward quotations and supporting information will be appended to the enquiry (either by scanning and saving or an enclosure within the customer file). The waste tracking system (Gatehouse) will provide traceability throughout by allocating a unique T reference to the enquiry.

All samples obtained must be clearly labelled using an approved sample identification label. These have been designed to ensure hazard identification is apparent at all times. Refer to example below.

GRUNDON		WASTE SAMPLE
Sample Reference No:		
Sample Date:	/ /	
Collected by:		
Sample Description:		
Customer/Destination:		
Hazard Property:		
UN Number:		
Document No: SO/TD/EWE/005b Revision No: 3.0 Issue Date: 05/04/2018		

Waste samples will be kept until disposal has been satisfactorily achieved at the final point of disposal.

11. Associated Documents/Records

- SO/TD/GEN/002a Waste Enquiry: Pre-Acceptance Assessment Form
- SO/TD/EWE/031 Waste Non-Conformance Procedure
- PPC Permit for Ewelme Hazardous Waste Transfer Station– WP3231SX
- SO/TD/GEN/007 Pre-Acceptance Procedure for the Wingmoor Farm Treatment Plant and Hazardous Waste Landfill
- SO/TD/GEN/002b to SO/TD/GEN/002I Quotation Request Forms
- SO/TD/GEN/006 Pre-Acceptance of Lithium Batteries Procedure
- SO/TD/EWE/005b Waste Sample Label