Standard Operating Procedure (SOP)

Title	SOP 03 TTW Non-Conformance.
Site	All Tankered Trade Waste (TTW) sites

Purpose	The Non-conformance procedure is in place to ensure all waste received corresponds to the original approved waste stream, regarding the approved analysis, odour and visual observations. TTW technicians follow these procedures to safeguard the sewage treatment process and ultimately protect the environment. Adherence to this SOP is essential for the safe and compliant handling of TTW at wastewater treatment sites. Non-conformances **must** be captured on CWID and closed off by the TW process team. Considerations to amending pre-acceptance must be made and captured on CWID to prevent re-occurrence.
Who	TTW Technicians, TTW Process team, TTW Manager and the Commercial team.

Must Have (H&S, Quality, Quantity, Environment, Training, Resources)

If none required then just add 'N/A'

- SOP 03 TTW Non-Conformance.
- SOP02 TTW Waste Acceptance.docx.
- PPE: Hard hat/bump cap, Hi visibility vest or jacket, Steel toe cap boots, Gloves and Eye protection.
- Be a technically competent person with up-to-date CMS training.
- CWID (Commercial Waste Information Database).
- Customer's Waste Transfer Note (WTN).
- Sample jars, Test Kits, pH meter, Spectrophotometer, Heating Block, as specified in SOP01 and SOP10.

Remember – 'Stop, Think, Take 20'

Summary Must Do's

If none required, then just add 'N/A'

- Check the received sample analysis with the approved sample analysis.
- Take a second sample making sure the waste has been mixed thoroughly and repeat analysis.
- If the non- conformance relates to the dip strip tests, perform an analysis using the Hach Lange equipment where possible.
- Contact a member of the Process team with the non-conformance.
- Contact the TW Commercial team about any rejections or changes to agreed discharge times.

Document Control & Governance:

Document Owner Name	Shayek Ahmed
Document Owner Role	Process Manager
Date of Next Review	03/07/2026
Version Number	Enter Version Number
Waterpedia Reference	*To be entered by Waterpedia Team*

Version	Date Reviewed	Summary of Changes	Reviewed by
1.0	07/04/2020	Initial non-conformance procedure updated	E. Ruswa
2.0	07/04/2021	Merged into a big document.	E.Ruswa
3.0	21/10/2021	Non-conformance procedure reviewed in line with current practices.	O.Boertje
4.0	14/02/2022	Updated references to include BREF	O.Boertje
4.1	05/01/2024	Checked with no adjustments	O. Boertje & C Bharadwa
5.0	05/07/2024	Reviewed and updated in line with current requirements	S. Ahmed & C. Bane

The only valid version of this Standard Operating Procedure (SOP) is the electronic version held in Waterpedia.
If printed, it is uncontrolled.
Ensure the printed version matches the Revision History details in Waterpedia.
If not, 'DO NOT USE' and contact your line manager for the new version

Standard Operating Procedure (SOP)

Procedure:

All Trade Waste streams are assessed and approved based on their material characteristics and waste classification according to WM3 guidance. For more information, please see the Waste Stream Approvals document (SOP 02). A non-conformance can typically arise from five major categories:

1. **Concentration** – The analysis is higher or lower than that stated in the approved analysis
2. **Contaminated load** – Noticeable signs of previous load(s) in the waste. This may be identified on visual, odour or analytical basis.
3. **Different material** – Waste is different to the original approved sample
4. **Non booked load –** The load has not been booked by the time it arrives on site.
5. **Paperwork missing / incomplete –** WTN does not have all of the legally required information present.

Non-conformance options also include:

6. Unsafe container/vehicle
7. Wrong waste stream

Duty of Care Paperwork:

The key information required is:

- Description of the waste.
- Volume of the waste delivered
- Correct EWC code for the waste stream.
- Signed declaration to confirm that the Waste Hierarchy has been applied.
- Name of the person, company and address of the transferor (person transferring the waste to someone else).

- Name of the person, company and address of the transferee (person accepting the waste from someone else).
- SIC code for the transferor.
- Waste carrier licence number for the haulier
- Status of the persons involved in the transfer (e.g., producer, importer).
- Address of transfer or collection point.
- Address of disposal point.
- Date and time of transfer.

Any discrepancies on the WTN for EWC codes, SIC codes or material description with those detailed in CWID/customer's Waste Approval Form, should be raised with the commercial team.

- The commercial team must discuss issues with the customer and by extension, the producer.
- The person responsible for the waste must confirm any changes to the WTN via email trail to our commercial team (EWC code, description etc.).
- The process team must ensure that if a code/description has been changed, that the material properties have not changed since approval and that the code is listed on the site permit.
- If the responsible party cannot be reached, or the waste is deemed unacceptable for any other reason, the load must be rejected.
- Rejected loads in this case need to be recorded as 'non-conforming – paperwork missing/ incomplete' on CWID.

Other missing or inaccurate information may be adjusted by the driver. The driver must sign next to any adjustments made.

Variance Against Approval Analysis:

Approved analysis for all waste streams is documented on CWID. When a waste stream sample differs from that of the approved sample:

- Ask the driver to agitate the waste thoroughly in the tanker using the vacuum and take a second sample to ensure a representative sample from the barrel is taken.
- If unchanged, check the special requirement tab in the booking on CWID, to see if there are any known acceptable analysis variations.
- If there are any variances recorded, or the sample analysis is outside of this range, the TW Process team should be contacted for discussion to determine the feasibility of acceptance. The commercial team will also need to be informed. The commercial team must ascertain the reason for the variance within the waste-stream.
- If the waste is rejected, the TTW technician must speak to the TW Commercial team before informing the driver that the load is rejected.

Lower thresholds of changes or known seasonal variation should already be picked up in the pre-acceptance of the waste. This information must be included in CWID. This does not necessarily need to be raised with customers but should be noted for reference with the TW Process team and wider technician teams.

When there is a non-conformance and the TW Process team is unavailable, contact the TW Manager. If unable to contact either the Process team or the TW Manager, get a second opinion about the non-conformance from another TTW Technician before contacting the TW Commercial team.

Contaminated load:

Contamination may occur when the waste has not been processed correctly, different chemicals or substances have been added to the waste or the waste has been contaminated by a previous load on the haulier's tanker.
Occasionally, producers may have issues on site, which can affect the waste process. This can result in changes in physical properties within the waste. Notable material differences can be observed in the waste. TTW Technician must visually, and odour check each load for possible differences in the waste:

- Layers in the site glass and/or sample can indicate contamination from substances such as grease, fat or oil. The top layer must be checked for water miscibility.
- Colour changes may indicate contamination especially if there is also a change in odour.
- Odour checks of the waste can reveal contamination from substances such as solvents and hydrocarbons.
- Any significant variances in pH must be raised to the process team. Any waste reading less than pH 2.5 and above pH 11 should be classified as hazardous waste according to WM3 guidelines. Unless an acid or alkali reserve test suggests that the classification as corrosive is not warranted, and further in vitro testing has confirmed that classification.
- If the waste is above pH 2.5 and below pH 11, a dilution test can be conducted to make sure waste is suitable for the sewage treatment process. For low pH wastes the pH must neutralize (around pH 7.0) at 1:200 dilution. For high pH wastes, the pH must neutralize at 1:400 dilution. Contact the TW Process team with the results.
- Speak to the TW process team about waste analysis variations to ascertain if the waste can be accepted and to ensure the waste variances are recorded and monitored where necessary.
- The TW Process team will decide if a sample of the non-conforming waste needs to be sent to an approved lab supplier to verify results taken on site acceptance.
- Rejected or non-conforming loads need to be recorded as 'non-conforming – Contaminated load' or 'Non-conforming – Concentration'.
- The TTW Technician must record the trail of events for each non-conformance in CWID, including who was contacted, the time the haulier was held up and what decisions were made and by who.

Contamination from Chemicals or Substances Added to the Waste
When the analysis of the customer's sample varies from the approved sample in CWID, it is possible the load has been contaminated. If this occurs the technician must:

- Ask the driver to agitate the waste thoroughly in the tanker using the vacuum and take a second sample to ensure a representative sample from the barrel is taken.
- Repeat the analysis. If the results remain different to the approved sample analyse the waste with the Hach Lange spectrophotometer when possible.
- Speak to the TW process team to report the non-conformance.

- The TW Process team will decide based on the type of waste, level of contamination and/or analysis variance, whether the waste will be acceptable or if the TW Commercial team should be contacted to gather more information from the customer about the cause or reason for the contamination.
- Using information provided by the TW Commercial team/customer, the TW Process team will decide whether the waste will be accepted or rejected based on:
    - WM3 guidance
    - The lists of wastes in the permit
    - The potential impact on the sewage treatment process
- Waste discharge conditions may be part of the acceptance decision (e.g. split discharge to reduce impact on ST process).
- Rejected or non-conforming loads need to be recorded as 'non-conforming – Contaminated load'.

Contamination from Previous Load

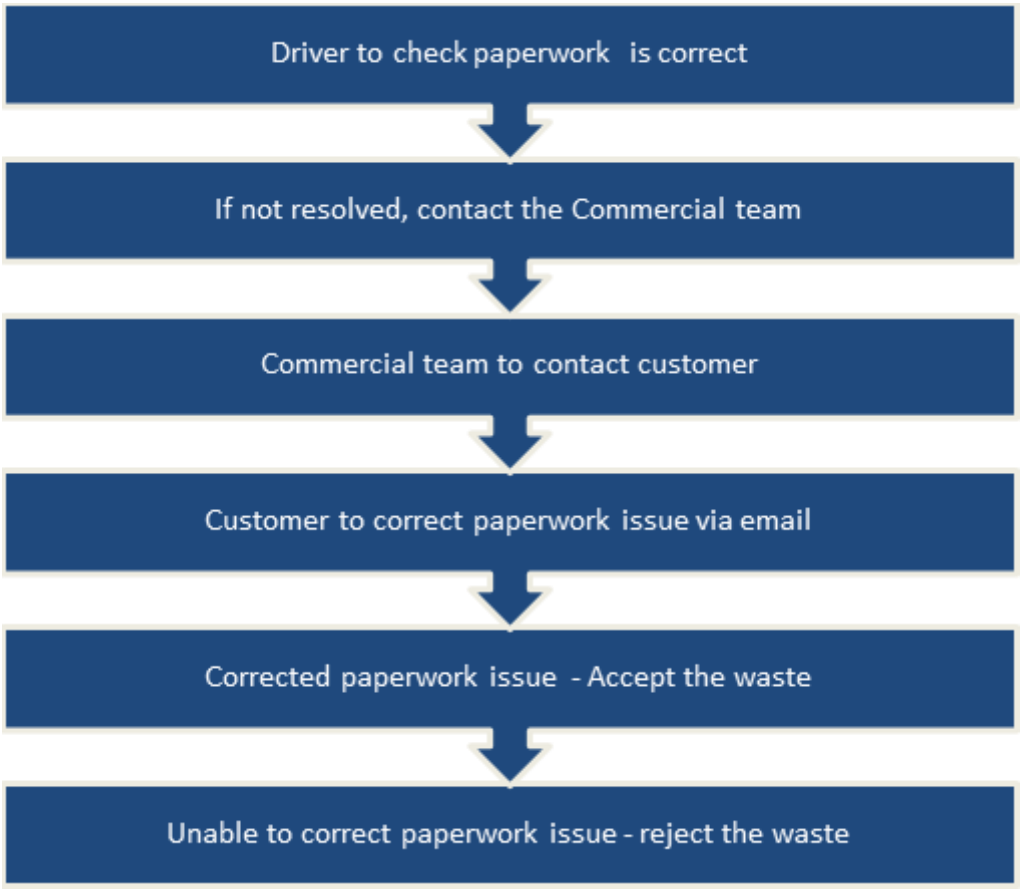
- TTW technician must check if the tanker's previous load was suitable for the sewage treatment process. This can be ascertained by checking the EWC is listed on the site permit.
- If the last load is not suitable for the site, or the physical properties will cause an environmental or safety risk, the customer will need to provide a wash out certificate otherwise the load must be rejected. Speak to the TW Process Team and the TW Commercial Team before rejecting the waste.
- Hazardous waste is not accepted at <u>any</u> TTW site. Therefore, when the previous load was classed as hazardous, a washout certificate is required (regardless of whether the EWC code is listed on the site permit).
- Waste containing animal byproducts (ABP) is not accepted at any TTW site and will require a washout certificate.
- If the driver does not have a wash out certificate with them, a copy can be emailed to the TTW technician or bookings office. This <u>must</u> be attached to the notes section of the waste stream booking in CWID.
- If the haulier fails to produce a washout certificate, contact the TW Process team and the TW Commercial team to reject the waste.
- Rejected or non-conforming loads need to be recorded as 'non-conforming – Contaminated load'

If the TW Process team makes the decision to reject the waste, The TTW Technician must speak to the Commercial team to inform them of the rejection before telling the driver on site.

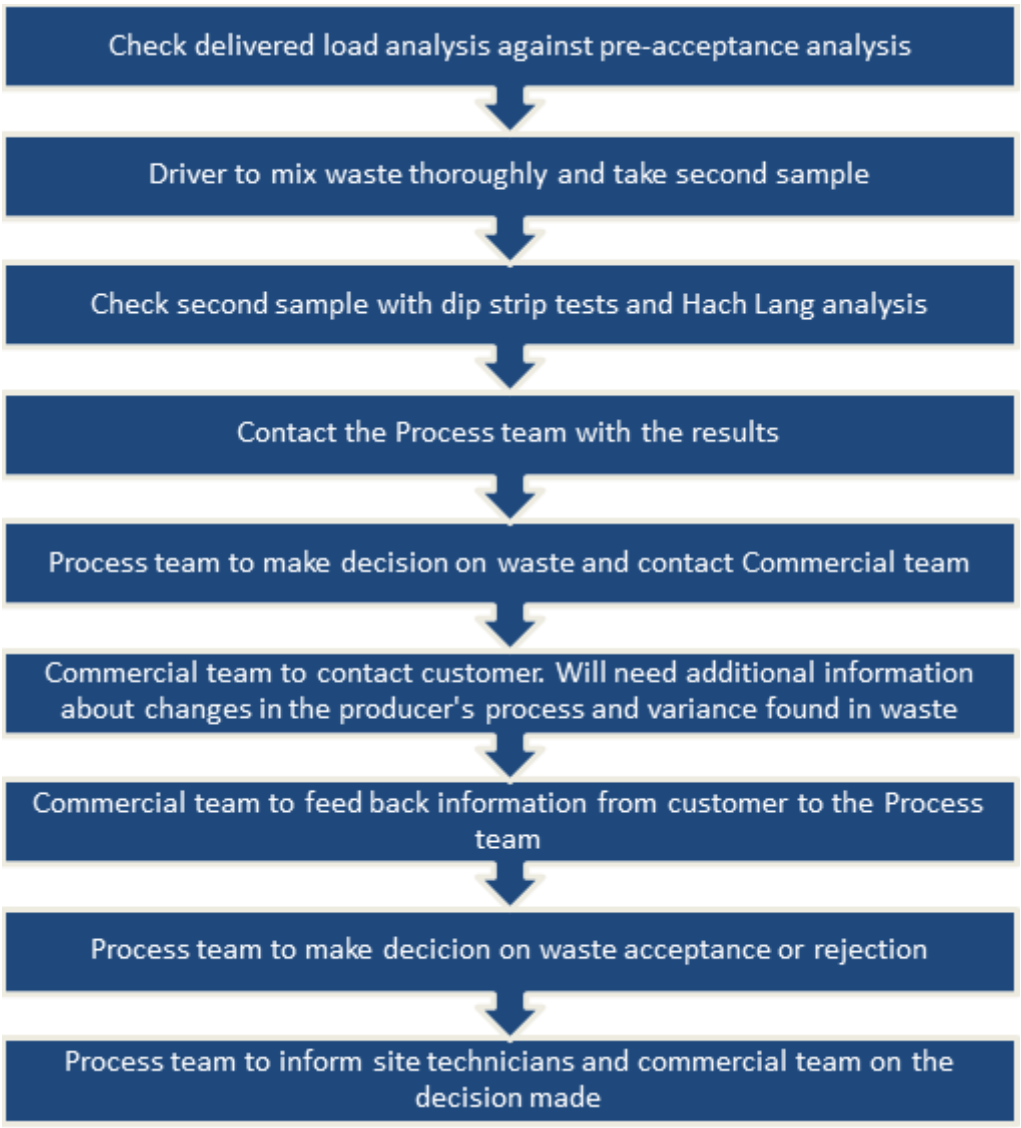
When a non-conformance results in the tanker being delayed on site or rejected, a non-conformance report must be completed and emailed to the TW commercial team. Attach a copy of the report in the notes section of the booking in CWID.

Process Flow

Paperwork Non-conformance



Waste sample Non-conformance



References:

- SOP01 TTW Waste Pre-acceptance.docx
- SOP02 TTW Waste Acceptance.docx
- Technical Guidance WM3: Waste Classification - Guidance on the Classification and assessment of Waste
- BREF for Waste Treatment 2018
- Site Permits - Guidance
  Legislation for duty of care from the Environment protection act 1990.