	STANDARD OPERATIONS PROCEDURE Non-Conforming Waste, Quarantine & Rejection Procedure	SOP: 3.4/NCWP
		Version: 1 Effective: DRAFT
Authorized by: OCL	Reviewed by: Julie Hudson	Approved by:
Date: March 2025		Review date:

1.0 PURPOSE

To ensure that all non-conforming wastes are handled and dealt with in an efficient manner ensuring that health and safety is maintained, legislative requirements are followed, and any commercial impact is controlled.

2.0 SCOPE

Storage and Treatment/Disposal facility.

3.0 RESPONSIBILITY


- TCM/Site Manager
- Site Chemist
- Site Transport Manager
- Drivers
- Technical Assessor
- Commercial/Sales Manager
- Administration team

4.0 INTRODUCTION

A non-conformance is raised to deal with a compliance issue that relates specifically to the acceptance of waste at the Facility. Any non-compliance issues that relate to site infrastructure, plant, equipment, health and safety or personnel must be dealt with using the individual company approved standards. A non-conformance covered by this procedure applies to the wastes, the container(s), and the delivery vehicle or haulage company. Non-conformances fall into a number of categories, some of which are detailed below:

- Documentation inaccuracies.
- Incorrect description of wastes.
- Incorrect weights, volumes and quantities from the originally booked/pre-acceptance.
- Waste that is non-compliant with the EPR Permit conditions.
- Waste that is not packed or labelled in compliance with The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations.
- Breaches in Health, Safety and Welfare practice or legislation.
- Where processing of the waste would incur additional costs.



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When non-compliances are a result of the actions taken by the customer, the customer must be notified as soon as possible. Notification does not in all cases have to be in writing; however, the non-conformance and notification details will be recorded in the waste customer file.

5.0 PROCEDURE

5.1 Raising a Non-Conformance

Every container needs to be checked to confirm quantities against accompanying paperwork. All containers should be clearly labelled and should be equipped with correct-fitting lids, secured caps and valves (when applicable) in place. Any damaged, corroded or unlabelled drums should be put into a quarantine area and dealt with appropriately. Following inspection, the waste should then be unloaded into the dedicated sampling/reception area.

If a non-conformance is identified during the site waste acceptance inspection, it may fall under, but not limited to one of the following criteria:

- Waste not to specification or unexpected waste delivered.
- Incorrect quantities.
- Issues during transport such as spillages, adverse reactions etc.
- Poor containment, packaging or labelling.
- Paperwork incorrect e.g. Hazardous Waste Consignment Note, Duty of Care Transfer Note.

During the waste acceptance inspection, consideration shall be given whether the load is non-conforming.

A Non-Conformance Report (NCR) needs to be completed in all cases where a non-conforming waste is identified.


When raising an NCR, it is important to gather as much information as practically possible to enable any issues to be resolved efficiently. This information includes, but is not limited to:

- Photographic evidence (ensuring you use intrinsically safe equipment where necessary)
- Details of customer's paperwork.
- Information from containers such as labels, tags and markings.
- Good written detail of the issues giving rise to the non-conformance including any recommendations.

Where waste does not meet the pre-acceptance information (or samples previously received) or the waste has not been pre-booked into site the following actions shall be taken to resolve the non-conformance:

- Inform the Technical Assessor, TCM, Site Manager or site administration team, shall be notified without delay of all non-conformances raised.



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- The Commercial/Sales Manager shall be notified of the non-conformance(s).
- The waste streams will be sampled to assist in determination of composition and whether acceptance or rejection is required.
- The vehicle(s) holding the non-conforming waste will be temporarily quarantined in a safe designated area until the non-conformance has been resolved.
- Where further information or confirmation is required from the customer in order to resolve the non-conformance, the waste shall be held in quarantine until such communication is received. It is the responsibility of the Commercial/Sales Manager to obtain this information or this can be accomplished by an appointed member of staff.
- Waste shall be rejected on the current consignment note where applicable and new paper work created, or for non-consigned waste new documentation shall be created.
- Waste shall be rejected without delay once determined not acceptable to site and in all cases within 5 working days of delivery.
- An NCR will be completed and recorded on the Fornax system with a copy sent to the Commercial/Sales Manager.

5.2 Close Out of Non-Conformance

The TCM/Site Manager will assist with the Technical Team to close out the non-conformance to:

- Consider whether the Environment Agency should be notified.
- Quarantine the waste and/or delivery vehicle if required.


The TCM/Site Manager must:

- Inform the Environment Agency if required.
- Provide assistance to close out the non-conformance.

Upon receiving a non-conformance, the Commercial/Sales Manager or Site Manager must:

- Inform the customer of the non-conformance ensuring that they are told the error that has led to the non-conformance, what action is required and the cost/health and safety implications.
- Assess and take appropriate action to complete the non-conformance.
- Each non-conformance can be very different, in that a wide range of determinants can initiate them. Close liaison between the Commercial/Sales Manager, TCM, Site Manager, Site Chemist and Technical Team is required to ensure that each non-conformance is resolved adequately.



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All non-conformance reports shall be forwarded onto the Site Manager, Commercial/Sales Manager, Administration Team (dependent upon local arrangements), and the Technical Assessment Team (as soon as practicable).

The Commercial/Sales Manager is responsible for liaising with the customer in respect of the non-conformance, unless they appoint a member of the administration team to do so on their behalf.

If the non-conformance results in a rejection this will be reported by the Commercial/Sales Manager to the waste producer and by the carrier to the relevant regulatory body by telephone and/or by email as soon as is practicable.

All rejected wastes will be segregated where possible but, in all cases, stored safely pending removal off site.

6.0 QUARANTINE OF WASTE

The TCM/Site Manager must:

- Ensure that vehicles holding the quarantined waste are parked safely in the designated area and held until the non-conformance has been resolved
- Any leaking containers on a quarantined vehicle are dealt with by following the Emergency Procedures as detailed in SOP_3.1.

Once determined that the waste requires quarantining the offending items will be clearly marked with a 'quarantine label' and the following information shall be visibly written and displayed on the offending container:


- Waste Receipt Number and container number.
- Date of receipt.
- Primary hazardous property (HP) code.
- Routing.
- Chemical identity of the containers contents.

The quarantined waste must not be processed, and the label must not be removed until the quarantine issues have been addressed.

The forklift operator will be shown the location of the quarantine items and requested to remove and place these items into the designated quarantine area.

The quarantine waste will be sampled, if required. Should the inspection or analysis indicate that the wastes fail to meet the acceptance criteria (including damaged or unlabelled drums), then such loads should be stored in a dedicated quarantine area and dealt with appropriately.



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Storage of quarantine waste should be for a maximum of five working days The waste can remain in the Quarantine Area for a maximum of 5 working days.

Quarantined waste must be stored in accordance with the requirements of the permit as well as HSG71¹, SGN 5.06 ²and Chemical Waste: Appropriate Measures³. Quantities of the quarantined waste shall be included within storage capacity calculations for the relevant area of the site.

If deemed necessary, contact the HSE with regards to any dangerous practice.

The Quarantine Record will be updated and the EA or SEPA notified when waste is removed off site where required.

7.0 REJECTION OF WASTE

When the load or part of a load is not suitable for acceptance at the site, the following actions should be followed by the Site Chemist responsible for the load. There are generally three options available when rejecting a load/part load:

- To return the load to the producer.
- To return the load to where it was collected.
- To transfer the load to a suitably permitted site which can accept the waste (provided acceptance is granted).

Once determined by a Site Chemist or TCM/Site Manager that a load or part load is to be rejected, the paperwork can be completed and the reason for rejection should be stated on Part E of the Hazardous Waste Consignment note. This is required for waste rejected in both England and Scotland.

If the waste has been incorrectly described on the consignment note, the waste load must be rejected. However, if the permit allows you to receive the waste, according to the correct description, you can still accept it onto site.

New paperwork should be raised in the following circumstances:


- If waste is rejected and moved to a new consignee.
- If waste is rejected/partially rejected and moved back to a customer's own premises.
- Waste that can be accepted but has been rejected due to paperwork inconsistencies.

¹ HSG71 Chemical Warehousing The Storage of packaged Dangerous Substances 4th Edition 2008

² Sector Guidance Note S5.06: recovery and disposal of hazardous and non-hazardous waste 2018

³ Chemical waste: appropriate measures for permitted facilities 2020



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When rejecting a waste load, the TCM/Site Manager or Commercial/Sales Manager must:

- Contact the producer/carrier/holder to confirm the new waste description and confirm that the waste under the new description can be received on site or at the new disposal site.
- Make a copy of the original consignment note.
- Request a new consignment note from the consignor/carrier or complete one on their behalf, if requested to do so.
- Add 'R' onto the consignment note number of the new note.
- Enter the correct details for the waste description.
- Give one copy of the new note to the carrier.
- Send a copy of the new note to the consignor and/or producer.
- The rejected load must be weighed to provide tonnage of waste removed from site. The quantities of containers must also be recorded.
- A copy of the consignment note should be retained to ensure that a record of the rejection and associated tonnages of waste removed off site is kept.
- It is the responsibility of the carrier (not the rejecting site) to report the rejection to the EA or SEPA as soon as is practicable. This does not preclude the rejecting site from providing assistance.

8.0 RECORDS

The TCM, Site Manager or Site Chemist must:

- Ensure that non-conformance reports are completed and passed to the correct person to action and ensure accurate records are kept.
- Inform company DGSA if required.

8.1 Associated Documents/Records

- Waste Acceptance
- Waste Rejection
- Documentary Tracking of Waste
- Emergency Response - Spillages

END OF DOCUMENT

