

Waste Pre Acceptance Procedure

Approved by:

Review date:

Chemical

Reviewed by: Julie Hudson

Authored by: OCL

Date: March 2025

1. Purpose of Work Instruction

1.1 To define the process for waste pre-acceptance including the frequency of pre-acceptance audit for each customer type, the process for audit review and corrective action, the maintenance of the

pre-acceptance database, and subsequent customer account set-up and waste delivery.

- **1.2** To detail the responsibilities of personnel with regard to waste pre-acceptance operations.
- 1.3 To specify the documentation and records required to ensure compliance with legislative and Company requirements.

2. Scope and Application

- **2.1** This work instruction applies to the Fornax Newton Aycliffe facility.
- 2.2 Failure to comply with the requirements of this procedure may result in investigation and subsequent formal action in line with the Company's Capability and Disciplinary procedures.

3. Responsibilities

3.1 Senior Management

Are responsible for ensuring that all BMS requirements are established implemented • maintained and continually improved in accordance with the standards to which the company subscribes and legislation relative to the company's operations.

3.2 Regulatory compliance managers

- Are responsible for monitoring and ensuring the implementation of all quality environmental safety and health policy procedure and work instruction.
- to waste audits, waste segregation and technical assessments where required.

3.3 Waste technical assessment specialist/QC.

Are responsible for maintenance of the pre-acceptance database including uploading customer audits updating customer information and issuing reminders to the commercial team and to customers.





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3.4 Commercial team

• Are responsible for ensuring all customer details are obtained.

They are responsible for offering the Fornax online audit service or third-party consultant audit service to new customers and for ensuring that waste is only accepted once a satisfactory audit has been completed (by Fornax or otherwise)

3.5 Waste auditing an assessment advisor

- Is responsible for reviewing pre acceptance audit information confirming acceptability and recording the information in the pre acceptance database.
- Is responsible for providing advice and guidance on any relevant matter pertaining as customer facing employees for providing advice and guidance on any relevant matter pertaining to waste segregation and technical assessments were required with assistance from the waste auditing and assessment advisor

3.6 General/site/plant and line managers

• Are responsible for the implementation and management of company policy and procedure ensuring that training is provided and that audits are completed

3.7 All personnel

• Are responsible for ensuring they understand company policy and procedures and always followed the process.

4. Process Overview

Waste pre-acceptance forms part of the commercial process operated by the Company. The procedure consists of several steps from sales enquiry through to commercial review. Completion of the required pre-acceptance is a mandatory stage in the commercial process.

Fully characterising the waste's composition is an essential step in the pre-acceptance procedure due to the complexities of hazardous wastes. The Waste Technical Assessment Specialist/QC will show an understanding of what is in the waste, to ensure the safe handling and correct storage is applied.

The Waste Technical Assessment Specialist/QC will select analytical tests based on knowing the process that generates the waste and will characterise the waste's composition at the preacceptance stage.





This procedure shall be followed to ensure compliance with regulatory requirements are maintained and to affirm that the most appropriate transfer route and waste storage area is established.

5.0 Waste Customer Enquiry

5.1 New Enquiry

For each new waste enquiry, the sales team will request information from the waste producer regarding the nature of the process producing the waste and the composition of the waste.

The Waste technical assessment specialist/QC confirm to the enquirer whether, or not the waste is technically and legally suitable for acceptance at the facility

The Waste Technical assessment process is a risk-based approach, considering:

- the source and nature of the waste
- its hazardous properties
- potential risks to process safety, occupational safety and the environment (for example, from odour and other emissions)
- knowledge about the previous waste holder

5.2 Record of Enquiry

A record will be created of the enquiry/waste stream and any testing results.

The Information will be recorded on WASTE INFORMATION FORM for each waste enquiry. The recorded details will include:

- details of the waste producer including their organisation name, address and contact details
- the source of the waste (the producer's business and the specific process that has created the waste)
- where the holder of the waste is not the producer, details of the waste holder including their organisation name, address and contact details
- information on the nature and variability of the waste production process and the waste

Details of the waste including:

- a description
- the List of Waste code (European Waste Classification (EWC) code)
- its physical form
- its composition (based on safety data sheets, where appropriate, or representative samples and robust laboratory analysis)
- any hazardous properties
- any persistent organic pollutants (POPs) present
- the potential for self-heating, self-reactivity or reactivity to moisture or air





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- any odour
- its age, that is when it first became waste
- the type of packaging
- an estimate of the quantity you expect to receive in each load and in a year

The assessor must also obtain confirmation that the waste does not contain a radioactive source. The facility is not permitted to accept radioactive materials.

5.3 Permitted Wastes

Some of the permitted wastes may require specific assessment and handling to prevent issues from properties that can pose unacceptable risks to the site or process, for example due to:

- a risk of explosion (e.g. aerosol canisters are present, or mixing processes that could lead to explosion)
- corrosion caused by strong acids
- a risk of uncontrolled reactions (e.g. if peroxides or strong oxidants are present, or polymerising components such as certain isocyanates)
- a risk of the evolution of gases (e.g. if cyanides, sulphides or dissolved gas are present) A list of such wastes will be established and held electronically.

The Waste Technical Assessment Specialist/QC shall verify the pre-acceptance information by contacting or visiting the waste producer, to help fully characterise the waste.

A representative sample of a waste will be obtained and analysed if:

- the chemical composition or variability of the waste is unclear from the information supplied by the customer
- there are doubts about whether the sample analysed is representative of the waste
- you will treat the waste at your facility (this allows you to carry out tests to determine if the planned treatment will be safe and effective)

When relying on a customer sample, a record will be produced to confirm that the waste accepted relies on the customer sample and the reason why is acceptable.

A representative sample is not required when the waste is:

- a pure product chemical or aerosol where the chemical composition and hazardous properties are available in a REACH compliant safety data sheet
- packaged cosmetics and pharmaceuticals
- contaminated clothing, packaging or rags
- an 'article', for example batteries, lighting tubes, waste electrical or electronic equipment, end-of-life vehicles or parts of vehicles, metal waste and scrap metal
- solid non-hazardous waste (except for mirror entries when the waste composition is unknown)
- contaminated wood and roofing material
- produced in an emergency you must not treat or offload such wastes until you have completed a full characterisation



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If the waste is laboratory smalls in containers of less than 5 litres, a representative sample is not required. However, if drums or other types of packaging are used for laboratory smalls, a list of the contents will be stored within the drum below the lid or attached to the drum.

Each packed drum (or other package) shall be labelled with the hazard for carriage, under the International Carriage of Dangerous Goods by Road (ADR) treaty.

The company's packaging preference will be supplied to the customer.

If a pre-acceptance sample of hazardous waste is not taken the reason will be recorded and stored/filed electronically.

If a customer has several containers holding the same waste the site chemist will apply 'the square root of (N) + 1' rule to sampling those containers, producing a composite sample of this waste. If the waste is variable, a sample from each container will be required.

Following characterisation of the waste, Waste Technical Assessment Specialist/QC shall technically assess the waste's suitability for acceptance and storage to ensure the permit conditions any Control of Major Accident Hazards (COMAH) requirements are met.

6.0 Liquid Wastes

The site chemist shall carry out analytical tests based on the information provided by the customer and an understanding of the process that generated the liquid waste.

The Waste Technical Assessment Specialist/QC will characterise the waste's composition at the preacceptance stage by one or more (if required) of the following measures:

- measure the density of the sample
- measure the water content
- measure the ash content after calcination at 550°C
- test whether the stream might inhibit biological treatment
- test for cyanide, and if present determine the free and complexed cyanide levels
- test for POPs
- check the content of volatile and semi volatile substances
- check the mass balance of liquid waste

Additional measures to consider include the pH, redox potential and electrical conductivity of liquid wastes.

Testing for heavy metals (As, Ba, Cd, Cr, Cu, Hg, Mo, Ni, Pb, Sb, Se, Zn) will be carried out as required to determine their levels individually and quantitatively. Testing of other metal content and other elements such as silicon, sulphur and phosphorous maybe carried out if applicable to the waste production process and waste type.



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If the Waste Technical Assessment Specialist/QC suspects that the analysis methods applied to the liquid sample will not extract and quantify the compounds present in any solid particles or in any separate phases, the sample will be separated into 2 fractions by either:

- filtration
- centrifugation
- decantation

This will allow the site chemist to determine the mass of each fraction and perform a comprehensive analysis of the separated liquid fraction and solid fraction, or of each phase, to provide a more accurate analysis.

7.0 Solid Waste

Waste Technical Assessment Specialist/QC shall carry out analytical tests based on the information provided by the customer and an understanding of the process that generated the solid waste.

The Waste Technical Assessment Specialist/QC / site chemist will characterise the waste's composition at the pre-acceptance stage by one or more (if required) of the following measures:

- measure the bulk density of the sample, without pre-treatment of the sample
- measure the water content
- measure the ash content after calcination at 550°C
- test for cyanide, and if present determine the free and complexed cyanide levels
- test for POPs
- check the content of volatile and semi volatile substances
- check the mass balance of solid waste

Additional measures to be considered include the pH, redox potential and electrical conductivity on a water extract of crude sample using a ratio of 10 l/kg of dry matter.

Testing for heavy metals (As, Ba, Cd, Cr, Cu, Hg, Mo, Ni, Pb, Sb, Se, Zn) will be carried out as required to determine their levels individually and quantitatively.

The site chemist will use the most practicable specific classical method of (partial) extraction of these metals and will specifically check for chromium (VI). If the waste is saline (conductivity > 0.15 S/m), the site chemist will measure the chlorides and all of the halogens to ensure metals are correctly speciated.

Testing of other metal content and other elements such as silicon, sulphur and phosphorous maybe carried out if applicable to the waste production process and waste type.



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When multiple immiscible phases or fractions are present in the waste, the site chemist will perform the analysis on each phase and combine them to provide the final result.

Analyses shall be carried at the Site's internal laboratory which has robust quality assurance procedures and uses the recognised test methods.

8.0 RECORDS

Pre-acceptance records will be kept for at least 3 years (in a computerised waste tracking system) following receipt of the waste.

9.0 RE-ASSESSMENT

In relation to an existing customer/producer of the waste an annual review and re-assessment of the information required at pre-acceptance must be carried out.

In addition, the pre-acceptance information must be re-assessed if:

- the waste changes
- the process giving rise to the waste changes
- waste received does not conform to the existing pre-acceptance information

10.0 ADDITIONAL PROCEDURES REFERENCE

SOP/3.1: Emergency Preparedness

SOP/3.8: Daily Site Monitoring

SOP/3.22: Contingency Plan

Site layout & Drainage plan denoting storage areas

Fire Prevention Plan (Fornax FPP)

10.0 CIRCULATION LIST

Job Title	Job holder at time of issue

10.0 REVISION HISTORY 4





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1.0	Original	N/A	

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