

Pre-Acceptance, Acceptance & Storage Procedures

Pre-acceptance procedures of non-hazardous and hazardous wastes at The Old Peat Works

1. After initial enquiry from a waste producer, 4R Group will obtain the following information about the waste to be imported to the Old Peat Works;
 - a. Type of process producing the waste
 - b. Specific process from which the waste derives
 - c. Quantity of waste
 - d. Chemical analysis of the waste to aid treatment, storage and eventual land spreading
 - e. Form of the waste *e.g.* solid, liquid, sludge
 - f. Any hazards associated with the waste
 - g. Sample storage and preservation techniques (if required)

The information gathered will be done both in written communication and also by site visits to the producing sites prior to acceptance.

2. Unless a sample and analysis has already been completed by a third party and 4R Group has sufficient written information from them, then we will obtain representative sample(s) of the waste ourselves. Data will be interpreted fully by FACTS qualified technical staff and an assessment of suitability for treatment, storage and eventual end use will be reported.
3. All chemical analysis will relate to an actual analysis and not be based on product data sheets or an extrapolation of information on product data sheets. However, where available MSDS's may be used to help inform operational staff of any specific properties that may impact how the waste is handled at The Old Peat Works.
4. No wastes will be accepted at the site without a clear treatment and/or storage plan for it. No wastes will be accepted that cannot be eventually applied to land, either as a sole material or post treatment. Wastes will only be imported if treatment and/or storage and final export is commercially viable.
5. 4R staff will ensure that samples are representative of the wastes and have been obtained by a person who is technically competent to undertake the sampling process.
6. All samples will be clearly labelled so the material/results are easily identifiable with any hazard identified.
7. All analyses will be carried out by accredited laboratories with robust quality assurance and quality control methods and record keeping.

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8. Analysis required will vary depending upon the nature of the waste, which of the three treatment processes will be used (if applicable) and what is known about the waste already. Results of analysis will be kept in 4R Groups shared files system so all data about a particular waste stream can be kept for cross-referencing *etc.* The analysis will include:
 - a. Key parameters for conformance with permit compliance
 - b. Analysis of materials both pre and post treatment (if this will be carried out at The Old Peat Works)
 - c. Analysis of any fractions sent for disposal (if required/applicable)
 - d. Analysis of hazardous characteristics (if applicable)
 - e. Physical appearance and analysis (if applicable)
 - f. Colour and general visual description
 - g. pH
 - h. Odour potential
 - i. Additional analysis that may be relevant to treatment, storage or eventual land application (*e.g.* neutralising value, organic matter content, contaminative substances, COD/BOD *etc.*)
9. Following characterisation of the waste, a technical assessment will be made of its suitability for treatment or storage to ensure Permit conditions are being met.
10. There will be a clear distinction between sales and technical staff roles and responsibilities, which is how the 4R staff operate for all existing mobile plant and site-based permits. If non-technical sales staff are involved in waste disposal enquiries, then a final technical assessment by the 4R consultancy team will be made prior to approval. This will help avoid build-up of accumulations of wastes at The Old Peat Works.
11. All records relating to pre-acceptance will be maintained and held in 4R Group's systems and databases for cross-reference and verification at the waste acceptance stage. These records will be kept for a minimum of 3 years.
12. Prior to arrival loads shall be booked into the site.

Acceptance procedures of non-hazardous and hazardous wastes at The Old Peat Works

Load arrival

13. The materials delivered to the Old Peat Works will be in bulk liquid, sludge, solid or powder deliveries. On arrival loads will;
 - a. Be weighed on the site weighbridge
 - b. Not be accepted into site unless sufficient storage capacity exists, and site is adequately manned to receive waste
 - c. Have all documents checked and approved, and any discrepancies resolved before the waste is accepted
14. Wastes will be received under the supervision of a suitably qualified or trained person

Load inspection

15. Where possible, confirmatory checks will be undertaken before offloading where safety is not compromised. Inspection must in any event be carried out immediately upon offloading at the site.
16. Liquid wastes delivered in bulk tankers will be visually checked to ensure the correct material is present in the tanker. This will be achieved by releasing a volume of the load into a bucket or similar container, so site operatives can confirm the waste stream prior to discharge into on site tanks. Load checking will take place on an impervious surface with a sealed drainage system. Any spillages will be cleaned up immediately. Tankered wastes will be transported using designated haulers, known to both the waste producer and 4R. Any unexpected or unknown tankers or lorries arriving at the site will not be allowed to discharge wastes.
17. The quantity delivered will be checked against accompanying paperwork. Following inspection, the waste should then be unloaded into a dedicated sampling/reception area. If the waste does not conform to corresponding paperwork or appears visibly contaminated in any way, then the waste will either be returned to the producer or as a last resort unloaded into a designated quarantine area away from other deliveries and other waste streams for collection.
18. Inspection and unloading (and sampling if required) areas will be marked on a site layout plan and have suitably sealed drainage systems.

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Sampling - checking - testing of wastes - storage

19. All hazardous wastes accepted at The Old Peat Works (e.g. materials with high pH/lime content), whether for on-site treatment or storage, will have been sampled for usability and suitability for processing at the site. This will confirm the identity of the waste, the description of the waste, compliance with permit and consistency with pre-acceptance information from the producer
20. 4R Group will ensure that waste delivered to the site is accompanied by a Waste Transfer Note or Consignment Note including;
 - a. a written description of the waste describing the physical and chemical composition
 - b. hazard characteristics and handling precautions (if required)
 - c. compatibility issues (if required)
 - d. information specifying the original waste producer and process
21. Any non-conformances to pre-agreed specifications, unsuitable or incorrect loads will be recorded in the site diary. Loads will be returned to the producer, or if contamination/off-spec material becomes visible only after tipping, the load will be removed to a designated quarantine area for prompt collection.
22. All WTNs and Consignment Notes are logged at 4R Head Office by administration staff and entered into an IWS system which forms a computerised record of deliveries for each waste stream imported/exported. Any deviations away from standard practices, i.e. loads not moved due to plant failure, load rejections, non-conformances etc. will be recorded in the site diary and reported immediately to the TCM/Senior Management.
23. Wastes will not be deposited in a reception area without adequate space.
24. All unloading, reception, treatment and storage areas will have an impervious surface with self-contained drainage, to prevent any spillage migrating or escaping off-site. A spill kit will be maintained and replenished on site for any spills of wastes in 'clean' areas. Any large spills or accidental release of wastes that may be a pollution risk will be reported to the TCM, senior management and the Environment Agency immediately.
25. Deliveries in bulk road tankers will predominantly be carried out by designated tankers for similar waste streams. If deliveries in bulk road tanker are being carried out by non-designated vehicles, loads will be accompanied by a "wash-out" certificate or a declaration of the previous loads so that contamination by this route can be checked.

Waste Rejection procedures

26. All wastes being imported into the Old Peat Works (hazardous and non-hazardous) will have been verified for suitability and usability in on-site processes or final end uses prior to any deliveries being made. Where loads contain visibly contaminated wastes or wastes not true to

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the agreement between producers and 4R Group, non-conformances will be recorded in the site diary and the load either rejected or put into quarantine for prompt collection. Most common non-conformances of materials eligible for land application are physical contamination of solid wastes (*e.g.* with plastics, oversize wood, glass *etc.*), physical contamination of liquids and sludge (predominantly with plastics) or sludges that have too much water *etc.* The proposed treatment processes at The Old Peat Works will allow 4R Group to process the majority of waste streams appropriately, enhancing their end specification for use on land. So typical non-conformances will be dealt with on site under the Environmental Permit by appropriately trained personnel.

Records

27. Full records of site deliveries, waste on stock, waste treated, and waste removed from the Old Peat Works will be maintained collectively via 4R Groups computerised ticket system, 4R shared files and the site diary. Records will be made and kept up to date on an ongoing basis to reflect deliveries, on-site treatment and loads removed.
28. All records relating to pre-acceptance will be maintained in 4R technical files (kept on a shared server) and this will be available at the site for any cross-reference and verification at the waste acceptance stage. Records will be held for a minimum of two years after the waste has been treated or removed off-site.
29. All files and records are back-up by the office server onto online cloud storage, serviced and maintained by 4R Group's IT support. All historic customer information is kept in secure archives on the company server or in cloud storage.

General

30. Wastes will not be accepted at the Old Peat Works without a clear defined method of recovery or disposal being determined and costed and ensuring there is sufficient capacity being available. These checks will be performed before the waste acceptance stage is reached.
31. Site staff will be appropriately trained in site specific acceptance procedures and trained to recognise wastes to be accepted at the Old Peat Works. All site work will be overseen by a TCM, reporting to senior management with all audit trails and records kept in accordance with 4R Groups ISO accredited management procedures (9001, 14001 and 18001). Staff will be provided with updated training and tool box talks as and when required. All training records will be maintained on the 4R database/server.
32. All analyses will be carried out by appropriately accredited laboratories familiar with the waste streams to be tested.

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33. There is a clear distinction between sales and contract managers, technical staff and site operatives. All waste enquiries will be interpreted prior to any movement of wastes and interpretations/recommendations will be checked by senior technical staff (FACTS qualified advisors).

Storage procedures of non-hazardous and hazardous wastes at The Old Peat Works

Offloading/discharge of waste

34. 4R Group site staff will ensure that all materials delivered will be unloaded in the correct discharge point or storage area.
35. Offloading and quarantine points will have an impervious surface with self-contained drainage, to prevent any spillage entering the storage systems or escaping off-site
36. Damaged hoses and connections will not be used.
37. Where liquid wastes are to be transferred into storage tanks, only couplings of the correct size for the connection will be used and the coupling will be able to withstand the maximum shut valve pressure of the transfer pump.

Record keeping

38. Records of wastes stored at the site will be maintained as described above.

Storage areas

39. Storage areas will either be in purpose-built storage areas or bays inside the main buildings, or in purpose-built covered storage bays on an impervious surface in the yard areas. Liquid wastes will be stored in sealed tanks to the west of the buildings. Storage areas are located away from watercourses and will be within the site permitted boundary at all times.
40. Storage areas will be located as such to eliminate or minimise the double handling of wastes within the site.
41. Storage areas will be clearly marked and signed with regard to the waste type and quantity. Hazardous characteristics will be shown (if applicable).
42. Storage area drainage infrastructure will ensure that all run-off is contained, and that fire cannot spread between storage / treatment areas via the drainage system.
43. Regular inspections and maintenance of storage areas, including vessels, pavements and bunds will be carried out, paying particular attention to signs of damage, deterioration and leakage. Records will be kept detailing action taken. Faults will be repaired as soon as

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practicable. If containment capacity or capability of bund, sump or pavement is compromised, (unless effecting a repair is more expedient and working with wastes in close proximity does not compromise safety), then waste will be immediately removed until the repair is completed.

44. There will be vehicular, for example, forklift, and pedestrian access at all times to the whole of the storage area such that the transfer of wastes is not reliant on the removal of others that may be blocking access.
45. All spillages of wastes should be logged. Any significant spillages which may result in migration off site or be a potential cause of environmental concern will be reported to the Environment Agency.
46. Activities associated with a fire risk will not be carried out within the storage areas in close proximity to wastes listed in the Fire Prevention Plan. Examples include grinding, welding or brazing of metalwork, smoking, parking of normal road vehicles except while unloading, charging of the batteries of fork lift trucks.

Aged stock

47. Long-term accumulations of waste will be avoided by stock rotation and adherence to capacity limits.

Compatibility testing

48. Compatibility testing will not be required. All wastes accepted at The Old Peat Works are eligible for application to land to confer agricultural benefit or ecological improvement, either in their natural format or post treatment. Any hazardous wastes accepted will be limited to waste streams with high pH or high liming content, deemed hazardous by the nature that they will be utilised for. Compatibility testing is therefore not required as wastes will not be reactive with other wastes. All wastes will be stored separately in designated storage areas or tanks.

Bulk storage vessels

49. Bulk storage vessels will be located on an impervious surface that is resistant to the material being stored, with sealed construction joints within a bunded area with a capacity at least 110% of the largest vessel or 25% of the total tankage volume, whichever is the greater.
50. Vessels supporting structures, pipes, hoses and connections will be resistant to the substances (and mix of substances) being stored. There will be a routine programmed inspection of bulk storage vessels with findings and corrective actions recorded. In the event

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of damage or significant deterioration being detected, the contents will be transferred to appropriate storage.

51. Vessels will not be used beyond the specified design life or used in a manner or for substances that they were not designed.
52. Tanks and vessels will be equipped with suitable abatement systems and level meters with both audible and visual high-level alarms as required. These systems should be sufficiently robust and regularly maintained.
53. All connections will be capable of being closed via suitable valves. Any overflow pipes will be directed to a contained drainage system, which may be the relevant bunded area, or to another vessel provided suitable control measures are in place.
54. Any plant and equipment taken out of use will be decontaminated and removed.
55. Pipework will be routed above ground wherever possible. Any below ground pipework will be contained within suitable inspection channels wherever possible.

Tank & process pipework labelling

56. All vessels will be clearly signed as to their contents and capacity.
57. Labelling should differentiate between wastewater and raw process water where applicable.
58. Written records of all tanks should be kept detailing capacity, construction information, maintenance schedules and inspection results, fittings (including joints and gaskets etc.) and waste types that may be stored/treated in the vessel including flashpoint limit if required.
59. A suitable pipework coding system will be used where required.