BROCKLESBY LIMITED
PERMIT VARIATION

Feedstock Pre-Acceptance and Acceptance Procedure

June 2021

BROCKLESBY
A BLEND FOR SUCCESS

Client: Brocklesby Limited

Document Reference: HC1676-18 Appendix 1

REPORT SCHEDULE

Operator: Brocklesby Limited

Client: Brocklesby Limited

Project Title: Brocklesby Limited Permit Variation

Document Title: Feedstock Acceptance Procedure

Document Reference: HC1676-18 Appendix 1

Document Status: Final V1.0

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Joanna Holland	8th June 2021
APPROVED	
Joanna Holland	8th June 2021

REVISION HISTORY	DATE	COMMENTS	APPROVED
Final Version 1.0	8th June 2021	For Client Review	Joanna Holland
Final Version 1.0	22nd June 2021	For submission to EA	Rob Brocklesby

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ANNEXES

1. INTRODUCTION

1.1. Introduction

1.1.1. This procedure describes the process that will be followed for characterisation and assessment of the suitability of wastes prior to receipt on site. It outlines the measures for ongoing monitoring and maintenance of any pre-acceptance standards agreed.

1.1.2. This procedure also outlines the processes that will be followed during acceptance of pre-assessed wastes at the site, to ensure that they are handled in accordance with permit and legislative requirements, and in a manner, which minimises potential negative impacts to the environment and the quality of end products produced at the site.

1.2. Scope

1.2.1. This procedure applies to all potential and actual wastes received at the Brocklesby Limited Facility.

2. PROCEDURE

2.1. Pre-Acceptance Assessment and Audit

2.1.1. To ensure suitability of wastes to be accepted at the site from a technical and legal perspective, all waste streams will be subject to pre-characterisation and assessment of associated handling requirements and risk before being accepted at the site.

2.1.2. To be accepted at the site, a waste must meet the criteria set below.

Parameter	Limits
EWC Code	Must appear on the site permit with any associated restrictions (see annex 1 for list of EWC's that can be accepted) Operator will check coding assigned pre-acceptance to verify agreement with the code assigned (see decision tree for assessment of suitable coding in annex 2)
ABP Category	Category 3 in accordance with APHA approval
Handling and Storage Requirements	Pre-Acceptance Assessment concludes that material can be handled and stored on site in a manner that is acceptable with respect to risk to staff and environmental receptors
Suitability of Material to Process	Pre-Acceptance Assessment concludes that the waste is suitable for use in onsite processes and for end products derived at the site.
Agreement of Acceptance of Material	Operations Manager, SHE Manager, and Financial Director to agree for acceptance of material
Sign of from Pre-Acceptance Assessment	The waste must be signed off as suitable for acceptance at the site following pre-acceptance assessment by the Managing Director

2.1.3. Before a feedstock is accepted on site, a pre-acceptance characterisation assessment will be carried out to determine if the waste is suitable for acceptance at the site.

2.1.4. This assessment will include an evaluation of the site and process of production, and the characteristics of the waste produced to allow an evaluation of the incoming material to ensure that

the nature of the material, the process leading to its production and any associated risks are fully understood.

2.1.5. The initial assessment of the waste, and any recommendations will be recorded on the new supplier pre-acceptance assessment form included in annex 3. Samples of the waste may be taken for analysis as part of a pre-assessment and characterisation process.

2.1.6. As part of the pre-acceptance and characterisation assessment, the operator will determine how often the supplier assessment will need to be reviewed in order to ensure continuing suitability of the waste, and to monitor for changes.

2.1.7. Audits will be carried out more frequently in the event of any of the following:

- Consistently out of specification loads received.
- Outages at the feedstock suppliers site;
- Notification from the supplier of a change in the process from which the material is derived; and
- On a random basis for 'spot checks'.

2.2. Pre-Acceptance Sample Analysis

2.2.1. Prior to acceptance sampling will be carried out and approved.

2.2.2. Testing incorporated internally would be for Moisture and impurities, Free Fatty Acids, Sulphur and Phosphorus. The in-house Lab team have over 25 years' experience in this field and are qualified to degree level in Natural Sciences (Biology). The tests carried out will follow approved SOP which are documented for use in the Laboratory. External Labs will be used to test for a wider range of results if needed i.e., Metals, Nitrogen, Chloride and unsaponifiables.

2.2.3. The site also benefits from input and support from a Research and Development Chemist.

2.2.4. The number of samples required for analysis to gain a representative characterisation will be decided by the senior management team depending on the findings of the pre-acceptance assessment and the anticipated variability of the material.

2.2.5. The methodology for sampling will be carried out in accordance with the sampling and monitoring procedures outlined in the site Environmental Management System.

2.2.6. Once a feedstock is accepted as suitable to enter the site it will undergo an additional monitoring period to verify its suitability and that the material arriving at the site is as expected.

2.2.7. This initial additional monitoring will be determined on a case-by-case basis as determined by the findings of the pre-acceptance assessment.

2.2.8. If a waste stream is found to fail to meet the anticipated minimum agreed standards, procedures will be followed per the agreement with the waste supplier.

2.3. Incoming Waste Acceptance Procedures

2.3.1. All wastes accepted at the site will have first been subject to the pre-acceptance assessment (see section 2.1).

2.3.2. Wastes delivered via tanker will be pre-booked and issued a unique number prior to arrival.

2.3.3. The booking in system and plant levels will be monitored daily to ensure there is adequate space in the system for the loads. If there are any outages within the plant that prevent the processing of feedstock, loads will be cancelled and diverted to other sites.

2.3.4. Liquid Waste Deliveries

2.3.5. Tankers delivering wastes will be directed to the weighbridge on arrival. Weighbridge staff will first check the consignment arrangements as follows:

- The delivery has been pre-booked;
- The delivery is accompanied by suitable duty of care waste transfer note documentation and animal by-products movement documentation if relevant;
- The feedstock has passed the pre-approval testing regime; and
- That vehicles are suitably labelled in line with ABP regulations requirements.

2.3.6. Once these checks have been made and found to be adequate, the weighbridge staff will provide the driver with a sample bottle and direct the driver to the weighbridge to be weighed. The weighbridge staff will notify the site manager that a delivery is about to be made. The consignment will be given a unique code and logged on the weighbridge system.

2.3.7. The loading operation will be supervised by an operator at all times.

2.3.8. The driver will provide the operator with the sample bottle and a sample will be taken from the tanker using a 5L sample beaker.

2.3.9. The sample will be tested in the lab for Moisture and Impurities, Free Fatty Acids, Sulphur, oil, odours, and any visual signs of excessive contamination. If the material is deemed suitable following immediate visual and olfactory assessment, the tanker will be allowed to unload.

2.3.10. If the waste is not deemed suitable following assessment, then the tanker will be asked to leave the site, or to park up and wait for further clarifications before unloading.

2.3.11. The operator will ensure that the tanker is set up to unload to the correct reception tank.

2.3.12. The operator will allow the driver to unload to the reception tank.

2.3.13. If at any point the operator has reason to think that the load is not suitable for acceptance at the site, the operator will ask the driver to stop the unloading and inform the Plant Manager/Supervisor.

2.3.14. A load can be rejected or unloading stopped if odour impacts arising are considered to be outside of acceptable limits that can be managed at the site.

2.3.15. Waste samples will be retained for reference for a period of 6 months.

2.3.16. Once the tanker has unloaded, the operator will check the reception area for spillages and wash down appropriately.

2.3.17. The operator will disinfect tanker wheels as required.

2.3.18. After unloading, the operator will clear the driver to leave the reception area. The driver will leave the area via the second weighbridge and be given a copy of the weighbridge ticket on departure.

2.3.19. If after unloading the operator suspects that there is an issue with the load it will be subject to further screening and possible quarantine and rejection.

2.3.20. Solid Waste Deliveries

2.3.21. Solid wastes will be delivered to the site in bulk skips or intermediate sized containers on curtain sided vehicles.

2.3.22. Vehicles delivering wastes will be directed to the weighbridge on arrival. Weighbridge staff will first check the consignment arrangements as follows:

- The delivery has been pre-booked;
- The delivery is accompanied by suitable duty of care waste transfer note documentation and animal by-products movement documentation if relevant;
- The feedstock has passed the pre-approval testing regime;
- The driver has had a site induction; and
- That vehicles are suitably labelled in line with ABP regulations requirements

2.3.23. Once these checks have been made and found to be adequate, the weighbridge operator will direct the vehicle to the correct area of the site for unloading.

2.3.24. The weighbridge staff will notify the site manager that a delivery is about to be made. The consignment will be given a unique code and logged on the weighbridge system.

2.3.25. The unloading operation will be supervised by an operator at all times.

2.3.26. Wastes will be tipped into a storage bay inside the waste processing shed.

2.3.27. The operator will make a visual and olfactory assessment of the wastes during tipping to assess that the material delivered is as expected and as identified on the incoming paperwork.

2.3.28. A core sample will be taken of all loads and tested for Moisture and Impurities, Free Fatty Acids, Sulphur and oil. A reference sample will be retained for 6 months.

2.3.29. If at any time the waste is deemed to be non-conforming or unsuitable, then the tipping operation will be stopped and the waste quarantined pending further assessment or dispatch from site.

2.3.30. A load can be rejected or loading stopped if odour impacts arising are considered to be outside of acceptable limits that can be managed at the site.

2.3.31. The operator will disinfect vehicle wheels as required.

2.3.32. The operator will clear the driver to leave the reception area. The driver will leave the area via the second weighbridge and be given a copy of the weighbridge ticket on departure.

2.3.33. If after unloading the operator suspects that there is an issue with the load it will be subject to further screening and possible quarantine and rejection.

2.4. Quarantine and Rejection of Wastes

2.4.1. The operator will reject loads that are not deemed to be conforming at any point in the acceptance process. The operator will enter into a supply agreement with waste suppliers which will define the wastes that can be accepted and the actions to be taken in the event that wastes arriving at the site are non-conforming. Agreements will outline the requirements for waste to be accepted at the site, the circumstances under which material will be rejected, and the procedure that will be followed if material is deemed non-compliant and rejection takes place.

2.4.2. The operator may choose to reject the load if the load arrives with incorrect paperwork, or non-conforming EWC Code, the material is out of specification or if material delivered is not that which has been pre-assessed/agreed.

2.4.3. All rejected loads will be recorded on the rejected loads register. This will include details of the reasons for the load being rejected, actions taken, and any photographic or paperwork evidence to demonstrate the actions taken and the reasons for this.

2.4.4. If at any point during unloading the operator suspects that the load has characteristics that may adversely affect operations on site, the operator will prevent further offloading pending further assessments. A load can be stopped for 1) High odours 2) Suspected high levels of contamination following visual inspection.

2.4.5. Further analysis will then be carried out to confirm that the load should be rejected, and the reasons for this, or whether the load is acceptable.

2.4.6. If a particular waste stream has not met the requirements of the supply agreement on more than 5 occasions within a rolling 3-week period, then the operator will consider whether the supply agreement should be terminated or reviewed. The termination of a supply agreement will be a last resort measure.

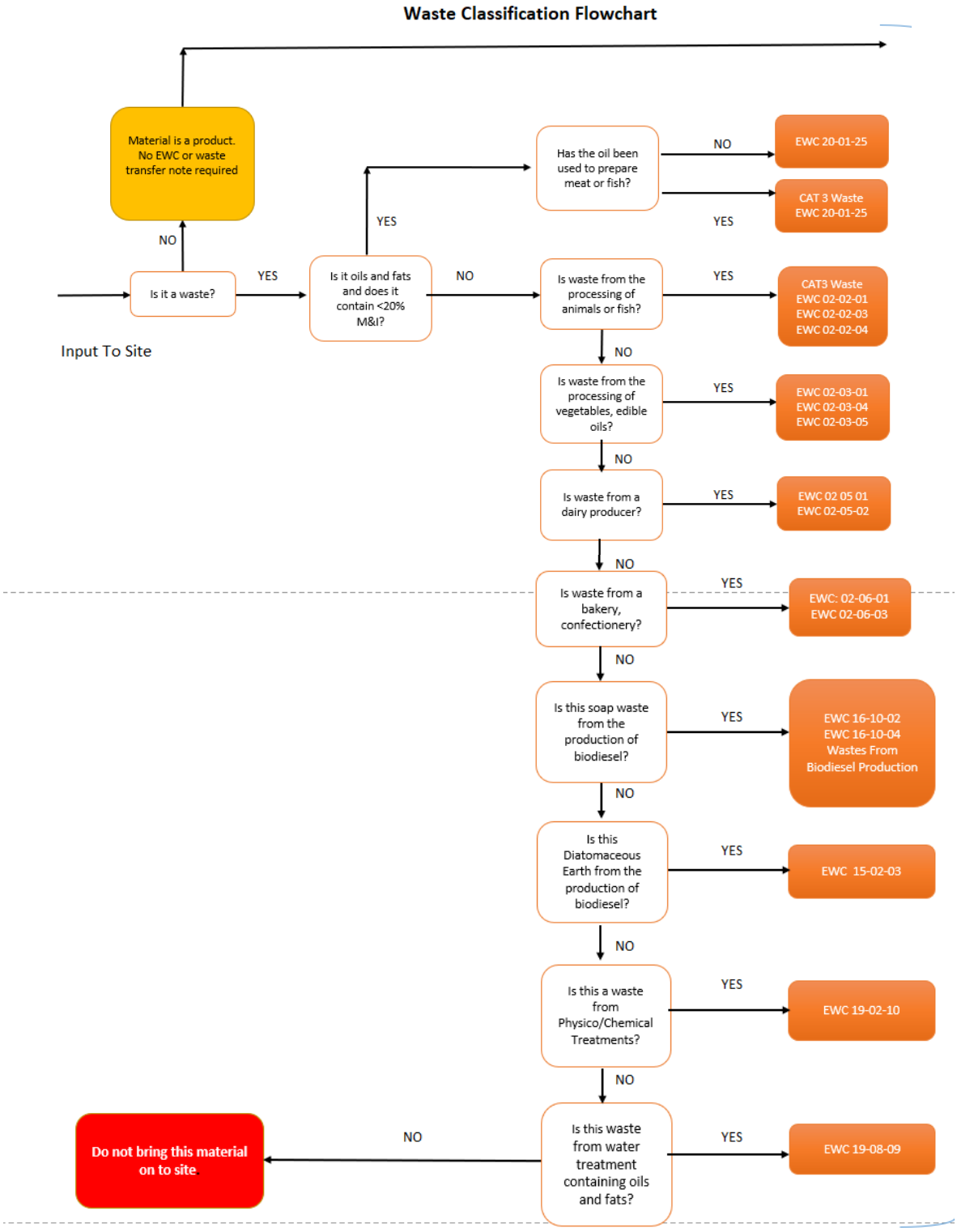
2.4.7. If all protective measures fail and non-conforming materials enter a storage tank or bay the material in the tank or bay will be quarantined and its contents removed from site within 5 days.

2.4.8. Any quarantined tanks or bays will be emptied, steam cleaned, disinfected if required by ABPR and inspected before returning to normal use.

Annex 1 – List of EWC Codes in Permit Schedule 2

EWC Code	Description
02 02 01	Sludges from washing and cleaning
02 02 03	Materials unsuitable for consumption or processing
02 02 04	Sludges from onsite effluent treatment
02 03 01	Sludges from washing, cleaning, peeling, centrifuging and separation
02 03 04	Materials unsuitable for consumption or processing
02 03 05	Sludges from on-site effluent treatment
02 05 01	Materials unsuitable for consumption or processing
02 05 02	Sludges from on-site effluent treatment
02 06 01	Materials unsuitable for consumption or processing
02 06 03	Sludges from on-site effluent treatment
07 01 99	Wastes not otherwise specified (limited to soap wastes from the manufacture of biodiesel)
15 02 03	Absorbents, filter materials, wiping cloths and protective clothing other than those mentioned in 15 02 02 (limited to diatomaceous earth filter cake containing biodiesel)
16 10 02	Aqueous liquid wastes other than those mentioned in 16 10 01
16 10 04	Aqueous concentrates other than those mentioned in 16 10 03
19 02 10	Combustible wastes other than those mentioned in 19 02 08 and 19 02 09
19 08 09	Grease and oil mixture from oil/water separation containing only edible oils and fats
20 01 25	Edible oil and fat

Annex 2 – EWC Assessment Tree



Annex 3 – New Waste Supplier Pre-Acceptance Assessment and Characterisation Form

New Waste Supplier Pre-Acceptance Assessment and Characterisation Form	
Date:	
Supplier name:	
Assessment carried by:	
Supplier address:	
Supplier point of contact:	
Supplier email:	
Supplier web address:	
Contact number:	
SIC code:	
EWC Code	
EWC agreed as suitable against decision tree?	
EWC on site permit?	
ABP Category	
Waste name/classification:	
Does EWC appear on ADQP (is the material suitable for inclusion in AD soup for PAS110 operators)?	
Waste composition and description:	
Waste production method:	
Potential for variation of waste	
Potential for physical contaminants to be present in the waste (list potential contaminants and origin in production process)	

New Waste Supplier Pre-Acceptance Assessment and Characterisation Form		
Likely tonnages of waste available and variance in supply		
Hazards associated with the waste		
Odour potential of waste		
Number of samples required to characterise waste		
Sample obtained:	Yes / No	
Sample analysed:	Yes / No	
Results:		
Handling and storage requirements:		
Preferred haulier/carrier:		
Third parties (if involved) in the supply chain:		
Additional notes:		
Recommendation for Acceptance at the site	Yes Suitable	No Not Suitable
Recommended method and frequency of monitoring of ongoing suitability		

New Waste Supplier Pre-Acceptance Assessment and Characterisation Form	
Agreement of Operations Manager	
Agreement of SHE Manager	
Agreement of Finance Director	
Approval is Provided for Acceptance of Material at Site (Must be signed by Managing Director)	Managing Director Signature

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