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| **STANDARD OPERATING PROCEDURE** |
| **Operation**  | Nonconforming Product Disposal | **Ref** | OC-SOP-007 |
| **Location** | All Sites | **Revision** | 1 |
| **Date** | 25/10/2023 | **Document Owner** | Group Operations Manager |

**Overview**

Standard Operating Procedure to describe the process for the disposal of nonconforming product at S Norton Group sites, and where applicable, the retrieval of costs incurred.

This procedure must be reviewed periodically in the event of an accident, or change in process, equipment or materials.

DO NOT perform this procedure until you have been appropriately trained and authorised to do so .

**Responsibilities**

**S Norton employee is responsible for:**

* Identifying any nonconforming product, reporting to HSE Rep/PIC and where applicable and handling in accordance with the **Emergency Action Plan OC-SOP-017.**

**HSE Rep is responsible for:**

* Where applicable, dealing with nonconforming product in accordance with the **Emergency Action Plan OC-SOP-017.**
* Taking photographs and communicating details as appropriate .
* Maintaining a record of the find on the Assure Incident and Observation System and relevant tracker, ensuring all actions taken are logged and recommending closure of event when appropriate.
* Contacting disposal companies for asbestos disposal quotes and informing the Buyer
* Updating the Buyer with any tracker reference numbers

**Environment Manager is responsible for**

* Determining the most efficient and cost-effective method of disposal of any non-conforming product as applicable including obtaining quotes and communicating this information to the Buyer.
* Liaising with the Environment Agency with details of any applicable nonconforming product.
* Calculating and recoding radiation levels.
* Providing advice and support to any Suppliers when requested.
* Carrying out a Duty of Care audit with Suppliers if required.

**The Buyer is responsible for**

* Producing letters to the Suppliers of nonconforming product and any follow-on emails as appropriate.
* Ensuring all actions taken are communicated to the HSE Rep.
* Communicating any requests to advice and support from Suppliers to the Environment Manager.
* Requesting the production of an invoice from the Accounts Team where applicable.
* Ensuring costs are retrieved from Suppliers where applicable.

**The Accounts Team are responsible for**

* On request from the Buyer, producing an invoice for the retrieval of costs relating to the disposal of non-conforming product.
* Email letter and invoice for costs to Supplier

**Procedure**

1. [Radioactive Finds](#A)
2. [Battery Finds](#B)
3. [Other Nonconforming Product](#C)

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| **Responsibility**  | 1. **RADIOACTIVE FINDS**
 | **Notes/ Deliverables** |
| Radioactive source has been identified, isolated and dealt with in accordance with the **Emergency Action Plan OC-SOP-017** |
| **(1)**HSE Rep | Update Assure**\*** with the radioactive findLog the details of the find onto the **Radioactive Waste Tracker\*\***Inform the Buyer of the **Radioactive Waste Tracker** reference number | **\*Assure Type of Incident:*** Radioactive Source Find (Hazardous) *for finds equal to or more than 2.5 µSv/hr*
* Radioactive Source Find (Non-hazardous) *for finds less than Less than 2.5 µSv/hr*

**\*\*Radioactive Waste Tracker:*** Supplier details
* item description
* dimensions
* weight
* instrument reading (µSv/hr) and nuclide
 |
| **(2)**Environment Manager  | Inform the Environment Agency of the find and update **Assure** with incident numberCalculate radiation activity level and record on **Assure**  and **Radioactive Waste Tracker**Identify correct disposal method:* dustbin disposal, or
* through specialist company
 | The Environment Agency must be notified immediately of any radiation find via the Incident Hotline 0800 80 70 60 and item disposed of within 12 months as per our permit conditions**Dustbin Disposal:** a sealed source up to 200kBq can be disposed of and open/unsealed solid waste sources (ie. not liquid or gas) up to 40kBq can be disposed of.**Non-Dustbin Disposal:** for sources above 200kBq disposal must be via a specialist disposal company. |
| **(3)**Environment Manager | Dustbin disposal method?**NO****YES**Obtain three quotes for disposal and inform Buyer of disposal method and cost. Inform Buyer of disposal method and cost. |  |
| **(4)**Buyer  | Produce letter using **Radioactive Find Template** and include reference number from the **Radioactive Waste Tracker**Email the letter to the Account Team and request generation of an invoiceUpdate the **Radioactive Waste Tracker** with the date letter sent to Supplier | **Minimum costs at the discretion of the Buyer:*** **Dustbin disposal:** £100 plus £250 handling charge.
* **Other disposal:** cost is dependent on activity level and source plus £250 handling charge.
 |
| **(5)**Accounts Team | Produce an invoice from the **Sales Invoice Register.**Email the invoice and the letter (as PDF) to the Supplier | Copy the Site Manager, HSE Rep and Environment Manager into the email.Invoice and letter to be sent out the same day that the letter has been generated.  |
| **(6)**Buyer | Follow up with telephone call if necessaryUpdate HSE Reps with action taken |  |
| **(7)**HSE Rep | Update **Assure** |  |
| **(8)**Buyer | Inform Environment Manager when payment is received.Liaise with the Supplier regarding payment for disposal of radioactive finds.Contact Environment Manager if support/advice has been requested from the Supplier | If payment has not been received with 12 months, the source must be disposed off in accordance with the Environmental Permit requirements |
| **(9)**Environment Manager | Once certification of destruction is obtained, save a copy onto the ‘K’ drive, hyperlink it to the **Radioactive Waste Tracker,** update the trackerSave a copy of the Waste Transfer Note onto the ‘K’ drive, hyperlink it to the **Radioactive Waste Tracker,** update the trackerContact disposal company to arrange disposalArrange disposal though site manager**NO****YES**Dustbin disposal method? |  |
| **(10)**Environment Manager | Arrange a Duty of Care Audit with the Supplier if requiredProvide advice and support to the Supplier if requested | In consultation with the Buyer, a Duty of Care Audit will be carried out if it is deemed that the Supplier has inadequate controls in place to prevent re-occurrence. |
| **(11)**HSE Rep | Update the **Assure** and close as appropriate | **Assure Incident and Observation System** |

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| **Responsibility**  | **B. BATTERY FINDS** | **Notes/ Deliverables** |
| Battery/Batteries have been discovered within material received on site  |
| **(1)**HSE Rep | Update the **Assure** (only if fire has occurred caused by the battery) Log the details of the find onto the **Battery Find Tracker** | **Assure Incident and Observation System** |
| **(2)**HSE Rep | Inform the Buyer if the Supplier if the batteries is known. |  |
| **(3)**Buyer  | Are there more than 5 conventional type batteries or unconventional large powerpacks ?**YES****NO**Produce letter using **Battery Find Letter Template** No letter requiredEmail the letter to the Accounts Team and request generation of an invoice | **Battery Finds Letter Criteria:*** **Up to 5 conventional type batteries** (*e.g. power tool portable battery*) will be identified on a weighbridge ticket and a £250 charge applied and deducted on the ticket itself**. No need for the battery finds letter to be sent for this.**
* **More than 5 conventional type batteries** (*e.g. power tool portable battery*) or a large power pack (*e.g. powerpack from an electric car*) **will require a Battery Finds Letter** to be issued with a £500 charge for the admin, safe handling and disposal of the batteries.
* For unconventional large powerpacks, e.g. electric ELV power packs, **a Battery Finds Letter** to be issued with a £250 charge for the admin, safe handling and the actual cost of disposal.
 |
| **(4)**Accounts Team | Email the invoice with the letter (as PDF) to the SupplierProduce an invoice from the **Sales Invoice Register.** | Copy the Site Manager, HSE Rep and Environment Manager into the email.Invoice and letter to be sent out the same day that the letter has been generated. |
| **(5)**Buyer | Follow up with telephone call if necessaryUpdate HSE Reps with action taken |  |
| **(6)**Buyer | Contact Environment Manager if support/advice has been requested from the Supplier. |  |
| **(7)**Environment Manager | Arrange a Duty of Care Audit with the Supplier if requiredProvide advice and support to the Supplier if requested. | In consultation with the Buyer, a Duty of Care Audit will be carried out if it is deemed that the Supplier has inadequate controls in place to prevent re-occurrence. |

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| **Responsibility**  | 1. **OTHER NON-CONFORMING PRODUCT**
 | **Notes/ Deliverables** |
| **(1)** | Nonconforming product has been discovered within material received on site and has been dealt with in accordance with the Emergency Action Plan | **Nonconforming product:*** Closed containers (*including gas cylinders*)
* Asbestos
* Vessels/ containers that potentially contain/have contained hazardous substances
* Munitions
* Excessive dirt, tyres or concrete (*disposal deducts of over 1500kg or as per the instructions of the individual Supplier*)
* Fridges and Freezers
 |
| **(2)**HSE Rep | Update the **Assure** (if applicable \*) Log the details of the find onto the relevant tracker | **\* Assure Incident and Observation System:*** Hazardous material finds
* Asbestos
* Munitions find

**Trackers:*** Asbestos Finds Log
* Radioactive Waste Tracker

Explosion & Prevented Explosion Trackers have been populated in accordance with the **Emergency Action Plan**.Fridges/freezers have been entered into RECY in accordance with the **Acceptance and Control of Waste Procedure** **OC-SOP-001** |
| **(3)**HSE Rep | Inform the Buyer of the tracker reference number if applicable |  |
| **(4)**HSE Rep  | Nonconforming Product type?**Other Nonconforming Product****Asbestos**Inform the BuyerContact disposal companies for disposal quote and inform the Buyer |  |
| **(5)**Buyer  | Produce letter using **Asbestos Find Letter Template** and include reference number from the **Asbestos Finds Log**Produce letter using **Nonconforming Product Letter Template** Email the letter to the Accounts Team and request generation of an invoice | **Asbestos minimum costs at the discretion of the Buyer:*** £250 handling charge plus disposal costs as applicable to the asbestos type and quantity.
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| **(6)**Accounts Team | Email the invoice with the letter (as PDF) to the SupplierProduce an invoice from the **Sales Invoice Register.** | Copy the Site Manager, HSE Rep and Environment Manager into the email.Invoice and letter to be sent out the same day that the letter has been generated. |
| **(7)**Buyer | Follow up with telephone call if necessaryUpdate HSE Reps with action taken |  |
| **(8)**HSE Rep | Update **Assure** (if applicable \*) | **\* Assure Incident and Observation System:*** Hazardous material finds
* Asbestos
* Munitions finds
 |
| **(9)**Buyer | Contact Environment Manager if support/advice has been requested from the Supplier. |  |
| **(10)**Environment Manager | Arrange a Duty of Care Audit with the Supplier if requiredProvide advice and support to the Supplier if requested. | In consultation with the Buyer, a Duty of Care Audit will be carried out if it is deemed that the Supplier has inadequate controls in place to prevent re-occurrence. |
| **(11)**HSE Rep | Update the **Assure** and close as appropriate | **Assure Incident and Observation System** |

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| **Hazards** |
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| **Competency Assessment** |
| **Assessment Date** |  | **Location** |  |
| **Employee Name** |   | **ID No.** |  | **Assessor** |  |
| **Confirmation of competency (please tick)** | **YES** | **NO** | **Date of Final Approval** |  |
| **Notes:** |
| **Any further training required?** | **YES** | **NO** | **Date of refresher training (if applicable)** |  |
| **Assessor Signature** |    | **Employee Signature** |  |

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| **Additional Information** |
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| **Reference** |
| * Emergency Action Plan OC-SOP-017
* Acceptance and Control of Waste Procedure OC-SOP-001
* Asbestos Finds Log
* Explosion & Prevented Explosion Trackers
* Radioactive Waste Tracker
* Battery Finds Trackers
* Radioactive Find Template
* Nonconforming Product Letter Template
* Asbestos Find Letter Template
* Battery Finds Letter Template
* Assure Incident and Observation System
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| **List of Forms** |
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| **Record of Revision** |
| **Revision** | **Date** | **Description of Change** |
| 1 | 25/10/2023 | Initial launch of SOP (previously P-005) |
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