

Non-Hazardous Waste Pre-Acceptance

GR-E01

Overview

The control of wastes and the prevention of unsuitable wastes being bought and accepted on site is a key management requirement to ensure quality control of the processes at the Graphite Resources Facility. The uncontrolled acceptance of unsuitable or contaminated wastes can lead to adverse reactions, uncontrolled emissions or product liability issues resulting from their treatment.

This procedure defines the upstream screening of all non-clinical incoming waste prior to its arrival on site and involves the provision of relevant information and representative samples of the waste. This is to ensure that Graphite Resources determines the suitability of the waste for the process, before arrangements are in place to accept the waste.

1. Pre-acceptance process

1.1 Initial Order/Enquiry

Prior to the delivery of any loads, the operator shall obtain and agree a written supply agreement for the wastes with each waste supplier. The written agreement shall provide the following;

- The waste type and specific source location(s) of the material;
- A brief description of the source type, physical form and the specific process producing the waste (usually defined by SIC Code)
- Chemical analysis of the waste (individual constituents and as a minimum their percentage compositions);
- Quantity of waste;
- Any hazards associated with the waste;
- Details of the suppliers quality management system and a statement from the supplier confirming their duty of care and commitment to quality control (consistency of waste type, source, handling requirements, presence of hazards within the materials etc);
- European Waste Catalogue (EWC) code.

If available, representative colour photographs of the waste should be provided. In addition, should the waste be allocated a mirror entry EWC code, data supporting the non-hazardous / hazardous status of the waste (i.e. a WM3 assessment) must be provided.

Such information shall be obtained by issuing a Producer Declaration Form (provided at the back of this procedure). This process should occur for all new waste streams introduced to site.

Author / Function or Department:	Process Owner / Department: Operations Manager
UNCONTROLLED WHEN PRINTED - MASTER COPIES HELD IN SITE OFFICE	

Under the conditions of the site Environmental Permit (EPR/KB3939RR) the operator is only allowed to receive specific wastes. A list detailing all permitted waste codes is detailed in Table 1 appended to this document.

1.2 Long Term Supply Agreements

In the case of long-term supply arrangements with clients / suppliers, the above details are only required to be obtained once for each particular waste stream received, excepting quantity of waste which must be recorded in the Site Diary per individual load and the relevant Duty of Care documentation (Waste Transfer Notes).

However, different waste streams from the same supplier must be accompanied with the above information should they have a different composition or be derived from a different process to previous wastes received.

The Producer Declaration Form, upon receipt, is signed by the Operations Manager (and / or their delegate).

No materials will be authorised for processing without sufficient / representative sampling data.

1.3 Sampling

Unless sampling and analysis of the waste streams has already been completed by a third party and Graphite Resources have sufficient information regarding the waste, Graphite Resources will obtain representative samples of the waste used on site and compare it against the written description to ensure that it is consistent.

Graphite Resources will ensure that the sample is representative of the waste and that it has been obtained by a person who is technically competent to undertake the sampling process. The analysis will be carried out by a laboratory with robust quality assurance, quality control methods and record keeping. Results of the analysis of the waste will be kept within the waste tracking system.

The results will include the following;

- All hazardous characteristics of the waste;
- The physical appearance of the waste;
- The colour of the waste;
- Particle Size and moisture content;
- If any odour present, a description and strength of the odour; and
- Whether the constituents declared by the waste producer match the sampling results to ensure permit compliance.

Author / Function or Department:	Process Owner / Department: Operations Manager
UNCONTROLLED WHEN PRINTED - MASTER COPIES HELD IN SITE OFFICE	

1.4 Inadequate Information

In the event of the receipt of a Producer Declaration Form with insufficient information (e.g. compositional details etc), all associated waste materials will not be accepted by Graphite Resources under the site waste rejection procedure (GR-E03 – Waste Rejection).

Each individual Waste Stream must be allocated an individual reference number which can be re-used in future transactions.

This will allow for the technically competent person(s) to adequately prepare for acceptance / rejection of the waste (see Procedure GR-E02 – Waste Acceptance) as each reference number refers to a specific waste whose characteristics (composition, individual concentrations etc) must remain the same.

The information relating to each waste stream shall be filed under its individual reference number on the producer declaration form, detailing the information above and stored in the site office.

2. Documentation and Records

All records relating to the pre-acceptance for each approved waste stream should be retained by the company secretary for a minimum of three years, or indefinitely for ongoing supply arrangements.

Hardcopies of the transferred waste will be kept in the site office as well as electronic files on the company computer system and will be available for inspection on request.

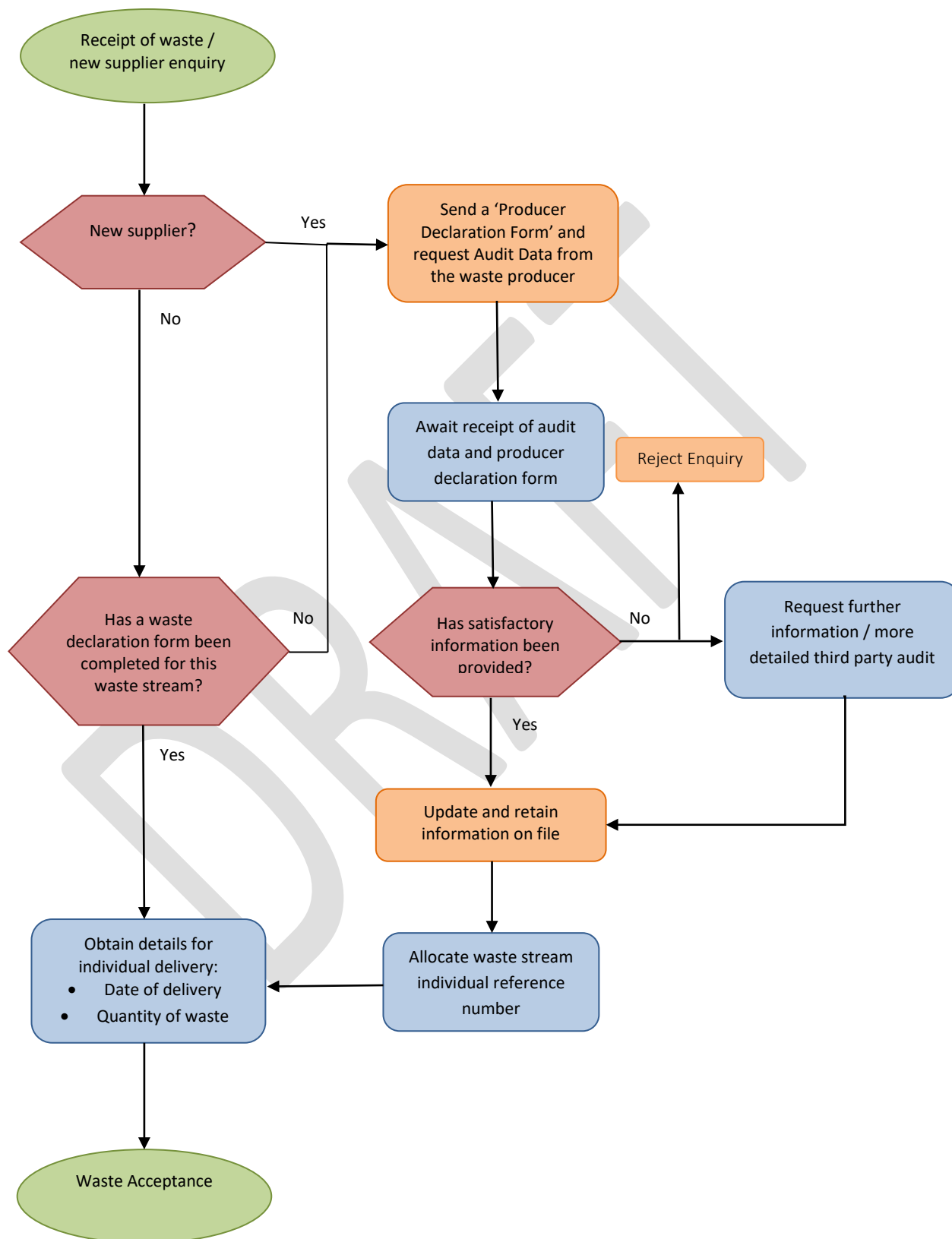
Each approved waste stream shall be documented under its individual reference number with the information detailed in Section 3.1.

Table 2.1; Internal record retention

Record	Retained by	Location	Hardcopy (✓/✗)	Electronic (✓/✗)	Retention Period
Form GR-E01_F1	Operations Manager	Site Office	✓	✓	3 years
Correspondence with EA/Consignors	Operations Manager	Site Office	✓	✓	3 years

Author / Function or Department:	Process Owner / Department: Operations Manager
UNCONTROLLED WHEN PRINTED - MASTER COPIES HELD IN SITE OFFICE	

3. Process flow chart: GR-E01 Pre-Acceptance



Author / Function or Department:	Process Owner / Department:
	Operations Manager
UNCONTROLLED WHEN PRINTED - MASTER COPIES HELD IN SITE OFFICE	

DATE: December 2019
REVISION: 2
DOC #: GR-E01
PAGE: 5 of 8

Mixed Non-Hazardous Waste
Pre-Acceptance



4. Training Record

The below signatories have received training and understand all aspects of procedure GR-E01.

Table 4.1: Training

PRINT EMPLOYEE NAME	EMPLOYEE SIGNATURE	DATE	MANAGER INITIALS	UN-CONTROLLED COPY ISSUED (✓)

Author / Function or Department:

Process Owner / Department:
Operations Manager

UNCONTROLLED WHEN PRINTED - MASTER COPIES HELD IN SITE OFFICE

DATE: October 2019
REVISION: 2
DOC #: GR-E01
PAGE: 6 of 8

Producer Declaration Form



Producer Declaration Form
Section 1
(to be completed by supplier)

Name of Supplier:

Address of
Supplier:

Supplier Number
(if allocated):

Description of
Waste:

Waste Code:
(shown in Appendix
1)

Hazard Code:

Waste Analysis
Information:
(if not available a
sample MUST be
requested for
analysis)

Quantity:
(per batch)

Quantity:
(per annum)

Description of
Odour
Characteristics:

Odour Intensity Scale:

Intensity	Tick Relevant Intensity
1 – No Odour	
2 – Faint Odour	
3 – Moderate Odour	
4 – Strong Odour	
5 – Very Strong Odour	

Author / Function or Department:

Process Owner / Department:
Operations Manager

DATE: October 2019
REVISION: 2
DOC #: GR-E01
PAGE: 7 of 8

Producer Declaration Form



Hedonic Tone Scale:

Perceived Hedonic Scale	Tick Relevant Hedonic Tone
+4 – Very Pleasant	
+3 – Pleasant	
+2 – Moderately Pleasant	
+1 – Mildly Pleasant	
0 – Neutral Odour / No Odour	
-1 – Mildly Unpleasant	
-2 – Moderately Unpleasant	
-3 – Unpleasant	
-4 – Very Unpleasant	

Signed:

Date:

Author / Function or Department:

Process Owner / Department:
Operations Manager

UNCONTROLLED WHEN PRINTED - MASTER COPIES HELD IN SITE OFFICE

Table 1.1 Permitted EWC Codes

Waste Code	Description
18	HEALTHCARE WASTE
18 01	Natal care, diagnosis, treatment or prevention of disease in humans
18 01 01	sharpes (except 18 01 03*)
18 01 02	body parts and organs including blood bags and blood preserves (except 18 01 03*)
18 01 03*	wastes whose collection and disposal is subject to special requirements in order to prevent infection
18 01 04	wastes whose collection and disposal is not subject to special requirements in order to prevent infection (for example dressings, plaster casts, linen, disposable clothing, diapers)
18 01 06*	chemicals consisting of or containing hazardous substances
18 01 07	chemicals other than those mentioned in 18 01 06*
18 01 08*	cytotoxic and cytostatic medicines
18 01 09	medicines other than those mentioned in 18 01 08*
18 01 10*	amalgam waste from dental care
18 02	wastes from research, diagnosis, treatment or prevention of disease involving animals
18 02 02*	wastes whose collection and disposal is subject to special requirements in order to prevent infection
18 02 03	wastes whose collection and disposal is not subject to special requirements in order to prevent infection
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 10	combustible waste (refuse derived fuel)
19 12 12	other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11

Author / Function or Department:

Process Owner / Department:
 Operations Manager