

CONTAMINATED FEEDSTOCK PROCEDURE

1. Procedure Objectives

- 1.1. To highlight the actions to be taken to identify non-conforming wastes and the remedial action to be taken in the event that a non-conforming load arrives on site.
- 1.2. To highlight the actions to be taken should a damaged vehicle/skip/bin arrive on site.
- 1.3. Contract waste sites should also refer to "**A2.3 - Appendix MS3-2 Waste Acceptance Protocol**"

2. Scope

- 2.1. This applies to those involved with the operation of the AD plants.

3. Health and Safety considerations

- 3.1. Contact with sharps is possible when handling contaminated waste, as such appropriate PPE, such as safety footwear and Needlestick / Cut-resistant gloves, should be worn at all times.
- 3.2. Contact with damaged bins, bolts etc. As such appropriate PPE, such as safety footwear and Needle stick / Cut-resistant gloves, should be worn at all times.

4. Environmental considerations

- 4.1. Contaminated waste must be segregated from acceptable waste to avoid non-conforming items entering the process.
- 4.2. Contaminated waste must be stored within the reception area before removal offsite.
- 4.3. Risk of leaching if container is damaged.

5. Responsibility

AD Plants

- 5.1. The Commercial Team is responsible for assessing the nature of contaminated loads and issuing instruction to accept or reject.
- 5.2. Site personnel are responsible for inspecting the waste and identifying non-conforming items within it.
- 5.3. Site personnel are responsible for taking good quality and relevant photographs showing the damage and sending these to the Commercial Team for assessment.
- 5.4. Site personnel are responsible for taking good quality and relevant photographs showing the non-conforming items and sending these to the Commercial Team for assessment.
- 5.5. Site personnel are responsible for recording the damage on the weighbridge ticket comments box/rejected loads ticket as appropriate and on the **Activ Incident Log**.

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- 5.6. The Commercial Team is responsible for investigating the incidents and contacting the customer/haulier whose vehicle/skip/bin is damaged to get the matter resolved.
- 5.7. The weighbridge operator is responsible for recording contamination in the weighbridge ticket comments box and where necessary marking the load as contaminated or rejected and/or completed the rejected loads ticket. This will also need reporting via the QR code system.
- 5.8. The Commercial Team is responsible for contacting the customers whose waste is contaminated or rejected.

The Commercial Team is responsible for documenting all contaminated /rejected loads in the **Contamination and Rejection Tracker from 1 April 24** spreadsheet.

6. Definitions

6.1. Non-conforming items

Items that are not suitable for processing within the AD sites, due to their exclusion within the environmental permit or their failure to comply with Biogen’s waste acceptance criteria.

Associated Documents

- 6.2. All associated documents referred to in this Procedure are highlighted in bold and underlined.

7. Procedure – reporting “attributable contamination”

“**Attributable contamination**” means any contamination which can be recognised as coming from a specific load.

See section 8 for non-attributable contamination.

- 7.1. Feedstock delivered to site should be inspected for contamination where safe to do so.
- 7.2. In the event that contamination is identified prior to weighing the vehicle, the vehicle must still be weighed in to ensure a full record is kept of all contaminated and rejected loads.
- 7.3. If contamination is found in the waste during inspection, the non-conforming items should be picked from the waste and segregated to be photographed where safe and practical to do so. Where Non-conforming item includes CAT 1 or Cat 2, site will scoop the contaminant and quarantine it, where it has not contaminated or leached into the whole load, removing any part of the load close to contaminant then contact compliance and commercial team for further advice. Where it is evident the whole load had been contaminated by the non-conforming item, whole load will be rejected. Compliance and commercial will be informed with all evidence of contamination taken and reported
- 7.4. If the waste is too heavily contaminated and picking is not possible or it is contaminated with clinical wastes/sharps, photographs should be taken of the non-conforming items within the waste. Do not attempt to pick material of this nature out of the waste, use the JCB to safely move the

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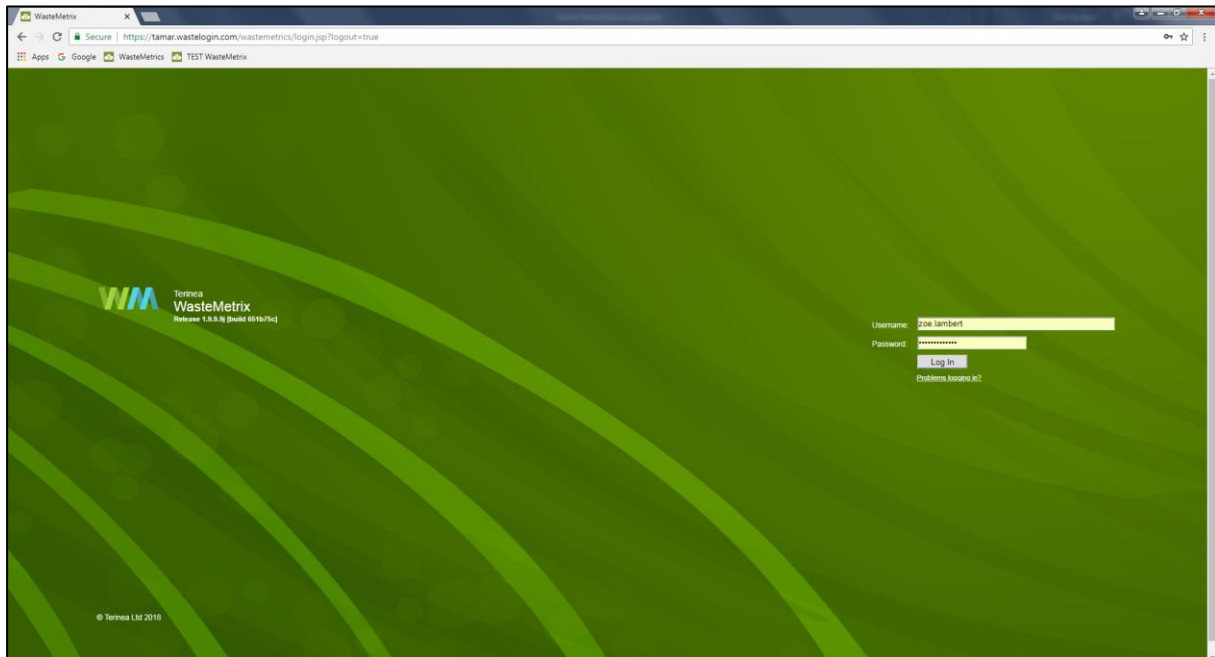
contaminated waste to one side of the loading bay and safely barrier off and quarantine. Commercial and Compliance shall be contacted to jointly arrange the necessary safe disposal of the load (or part load).

- 7.5. The area from which the contaminated load has been moved and the path that the JCB has taken shall be carefully inspected for remaining contaminants such as syringes and other medical sharps that were not picked up by the Telehandler bucket. Any such contaminants found shall only be picked up with the aid of a 'picker' and gloved (cut proof) hands. These should be placed needle down into a dedicated hazardous waste sharps bin in accordance with Safety Bulletin 11/10/16.
- 7.6. The Commercial Team will assess the contamination and inform the Operator whether to accept or reject the waste. Assessment should be made in accordance with the following tables:

AD sites

Contaminants	Maximum proportion of unpackaged waste load (by weight)	Maximum proportion of packaged waste load (by weight)
Paper / Cardboard	5%	Combined percentage 15%
Plastic (including plastic bags)	Combined percentage 1%	
Metal packaging		
Textiles		Combined percentage 1%
Glass		
Nappies		
Soil / Rubble		
Other – woody garden waste		
– foreign objects		
Any material that is not included within the Company's permits for the Site	0%	0%

- 7.7. In the event the Commercial Team deems the contamination to be minor, the non-conforming items must be picked and segregated where it is safe and practical to do so. These items shall be stored in the designated quarantine area. If the materials are hazardous in nature, e.g. fluorescent tubes, batteries, gas cannisters etc, these shall be stored separately and disposed of in accordance with the **Disposal of Hazardous Waste Procedure**. A member of the compliance team shall be consulted with regards to the suitability of any disposal route.
- 7.8. In the event the Commercial Team deems the waste to be sufficiently contaminated to warrant a full rejection, or the load contains clinical wastes/sharps, the entire load shall be rejected. The Commercial Team shall advise on the disposal route of the rejected load, where hazardous materials are identified the Commercial Team shall consult with the Compliance Team.
- 7.9. Where a load is contaminated or rejected, the contamination or rejection box shall be ticked accordingly on the weighbridge system. Where rejected, the reason for the rejection shall be entered in the box to the right. Further instructions can be found in the **WasteMetrics**.



- 7.10. Contaminated loads should be entered on the Activ Incident Log, including photos. This should be reported using the “Contamination” Incident Category. The investigator should be assigned to Senior Commercial Sales Support.
- 7.11. Commercial Team will then capture details reported on QR code system into the Contamination and Rejection Tracker from 1 April 24 spreadsheet on the O drive.
- 7.12. Commercial Team shall forward to the relevant customer as appropriate. A response will be sought to cover what action the customer will take to avoid further contamination.
- 7.13. Any costs incurred will be recovered from the customer at the discretion of the Commercial Team.

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- 7.14. The details of the contamination and action taken including email correspondence and photographs will be retained by the Commercial Team in Contamination and Rejection Tracker from 1 April 24 spreadsheet on the O drive.
- 7.15. The Commercial Team will feed back key contamination-related information to the site teams. Commercial will also circulate a monthly report to site managers and Operations Director. A summary will also be given for the Management review meeting.
- 7.16. The Commercial Team will monitor the spread sheets monthly to identify and manage persistent offenders.
- 7.17. Where repeat offenders are identified, a meeting to agree an action plan shall be held between a member of the Commercial Team and the Customer as necessary.
- 7.18. If, following the implementation of the agreed actions, improvements are not made, services with that particular customer shall be discontinued.

8. Procedure – “Non-attributable contamination”

“**Non-attributable contamination**” means any contamination which cannot be attributed to a specific load. For example, contamination which is found in the pile after multiple loads have tipped, or contamination which enters the equipment.

Where non-attributable contamination is found, the following steps should be taken immediately:

- 8.1. Site team should safely remove contamination using the appropriate PPE and safety procedures.
- 8.2. Site team will follow steps 7.10 – 7.12, reporting the contamination as “non-attributable” but offering as much information as possible regarding time of day, deliveries, etc.
- 8.3. Commercial team will begin to collect instances of non-attributable contamination and send out a general ‘note’ to all suppliers who could have delivered the load. Over time, Commercial will be able to see if there are trends or patterns that can attribute certain contamination types to certain suppliers.
- 8.4. Where possible, Commercial team will follow steps 7.10 – 7.18.

9. 3rd Party weighbridges or in the event of manual tickets

9.1 Where a load is rejected at sites who do not operate their own weighbridge, or the weighbridge system is down allowing only for a manual ticket to be produced, a rejected loads ticket shall be completed and entered on the Activ Incident Log.

9.2 This should be signed by the Site Manager/Site Supervisor, the white ticket should be given to the driver of the vehicle, the pink should be attached to the weighbridge ticket and the green should remain in the rejection book.

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BIOGEN[®]

BIOGEN (UK) Ltd
 Milton Parc, Milton Ernest, Bedfordshire, MK44 1YU
 Tel: 01234 827249 Fax: 01234 827210

REJECTED LOADS

Name of plant.....

Date..... Time.....

Customer..... Haulier.....

Weighbridge
 Ticket No..... Vehicle Reg.....

Document Ticket No..... EWC Code.....

Waste Description.....

Reason for Rejection:

Waste discharged on site **YES** **NO**

If YES and not possible to reload it will be removed and sent to a suitable licensed facility.

Site Manager Signature.....

Drivers Signature.....

PLEASE SHOW THIS TO THE WEIGHBRIDGE OPERATOR WHEN LEAVING THE SITE

If you have any queries please contact the Commercial Team on 01234 827249.

WHITE COPY TO CUSTOMER PINK COPY ATTACH TO WEIGHBRIDGE TICKET
GREEN COPY STAYS IN BOOK

10. Actions in The Event of Vehicle Damage

- 10.1. Vehicles and skips/bins arriving on site should be inspected upon arrival.
- 10.2. If a vehicle is found to be damaged, a picture shall be taken where safe and practical to do so and sent to the Commercial Team.
- 10.3. If the site deems the damage too severe to safely off load the vehicle then the load shall be rejected and sent off site.
- 10.4. Where a load is rejected due to a damaged vehicle, the contaminated box shall be ticked accordingly on the weighbridge system and the reason for rejection entered. Further instructions can be found in the **WasteMetrix Work Instruction for weighbridge staff**.
- 10.5. If the damage is minor and the site team are happy and confident to off load the waste, then once the vehicle has tipped they should report the damage to the Commercial Team for the AD sites who will contact the customer/haulier.
- 10.6. Note* All records of delivery vehicle damages or failures shall be reported to the Site Manager and recorded on the **Activ Incident Log**. The responsibility of investigating and resolving all such incidents shall be allocated to the Commercial Team.
- 10.7. The incident log shall contain the following to aid Commercial in their investigation:
 - Photographs of the damage
 - Date of the issue
 - Customer and Haulier involved (where known)
 - Weighbridge ticket number (where known)

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- Details of any downtime or damage to equipment
- 10.7.1. The Commercial Team shall ensure each incident is sufficiently closed with measures that prevent re-occurrence.
- 10.8. The details of the damage and action taken including email correspondence and photographs will be retained by the Commercial Team in the relevant spread sheets and folders.
- 10.9. The Commercial Team will monitor the spread sheets on a regular basis in order to identify and manage persistent offenders.
- 10.10. Where repeat offenders are identified, a meeting to agree an action plan shall be held between a member of the Commercial Team and the Customer.

11. Millerhill AD – Information to SEPA

- 11.1. Complete the ‘Food Waste Treatment Facility – Rejected Load Form’ shown below. Save a copy to the folder and send a copy to SEPA (keith.alison@SEPA.org.uk).
- 11.2. In collaboration with the load’s supplier, have the load removed from the site as soon as is reasonably practicable.

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Food waste treatment facility - rejected load form				
Date	Carrier	WTN Number	WB reference	Vehicle registration
Description of material				
EWC code				
Source				
Reason for rejection				
Destination of rejected load				
Amount (tonnes)				
SEPA officer notified				
Form completed by: (permitted facility contact)				
<p>Please submit this form to your local regulating SEPA officer and email a copy to zerowaste@sepa.org.uk</p>			