

SAFETYKLEEN

Waste Pre-Acceptance Checks Procedure

Environment Agency submission

Demonstration of robust pre-acceptance checks, characterisation, sampling and waste acceptance controls

Organisation	Safetykleen UK Ltd
Document status	Controlled operational procedure – Environment Agency aligned
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Purpose

To provide clear assurance that Safetykleen UK operates a precautionary, evidence-led and auditable process for completing waste pre-acceptance checks before waste is collected or received. The process ensures that sufficient information is obtained to understand the source, nature, composition, variability, hazards and management requirements of the waste; that the waste is correctly classified; that it is technically and legally suitable for the intended facility and route; and that any required sampling, analysis or additional evidence is completed before acceptance.

No reliable characterisation, no acceptance.

Executive Summary

Safetykleen's waste pre-acceptance checks form the first technical control in the waste acceptance chain. The checks are completed before the waste arrives wherever reasonably practicable and are linked directly to the approved waste profile, Technical Assessment Report (TAR), sampling and characterisation controls, incoming load verification and the Non-Conformance Procedure for Waste.

- Formal, documented and risk-based pre-acceptance checks for each waste stream.
- Evidence-led classification using WM3 and the applicable List of Waste code.
- Collection of sufficient information from the waste producer and, where relevant, previous waste holder(s).
- Assessment of composition, hazardous properties, POPs, physical form, variability, age, packaging, odour and relevant reactivity risks.
- Risk-based decisions on whether representative sampling and laboratory analysis are required.
- Technical assessment of permit suitability, storage and segregation requirements, and the proposed recovery, treatment or disposal route.
- Documented technical approval before collection or acceptance, with defined acceptance parameters and non-conformance criteria.
- Full traceability through TARs, surveys, analytical records, acceptance records and NCRs.

The Environment Agency's appropriate measures use the term 'waste pre-acceptance procedures' and require operators to know enough about a waste stream, including its composition, before it arrives so they can assess and confirm technical and legal suitability. This procedure therefore uses 'pre-acceptance checks' and 'pre-acceptance information' consistently, rather than treating pre-acceptance as a laboratory test alone.



1. Objective

The objective of the pre-acceptance checks is to ensure that Safetykleen only progresses a waste stream where sufficient evidence exists to:

- identify the waste producer, holder and source process
- understand the nature, composition and variability of the waste
- assign and support the correct waste classification and EWC code
- identify relevant hazardous properties and other regulatory controls
- determine whether sampling or analysis is required
- confirm the waste is technically and legally suitable for the intended Safetykleen facility and onward route
- identify safe transport, packaging, storage, segregation and emergency response requirements
- define the checks and parameters to be used when the waste arrives

The approach is consistent with the Environment Agency's requirement for risk-based pre-acceptance and for the operator to retain records that justify the decision to accept waste.

2. Scope

This procedure applies to all waste streams intended for collection, transport, receipt, storage, transfer, treatment or onward management through Safetykleen branches, staging areas or approved third-party routes.

It covers the process from the initial customer waste enquiry through completion of the pre-acceptance checks, technical assessment, sampling or analysis where required, approval and scheduling. It also defines the information that must be re-assessed when waste or the process generating it changes, when incoming waste does not conform to the approved profile, or during the annual review.

This procedure should be read alongside the Waste Acceptance Procedure, Waste Sampling and Characterisation Procedure, Representative Waste Sampling and Recording Process and Non-Conformance Procedure for Waste.

3. Roles and Responsibilities

Role	Key responsibilities
Waste Consultant / Waste Sales Representative	Obtain accurate producer information, arrange completion of the Customer Waste Survey, request supporting evidence, identify known sampling or verification requirements, arrange site visits where necessary, and do not promise collection before technical acceptance requirements are complete.
Technical Support Office (TSO)	Review the pre-acceptance information, identify information gaps, complete or coordinate WM3 classification, review analytical evidence, generate, amend or deactivate TARs, determine sampling/verification requirements, maintain technical records, and communicate deviations or non-conformances.
Technical Waste Assessor / Designated technically competent person	Complete the technical analysis of waste suitability, review classification, hazardous properties, compatibility, permit constraints and proposed treatment route, and provide technical approval where required.
Competent sampling personnel / approved sampling partner	Obtain representative samples in accordance with the approved sampling plan and documented sampling process, maintain sample integrity and chain of custody, and submit samples for appropriate analysis.
Warehouse Operative / FCE / Branch Leadership	Verify incoming loads against the approved waste profile, check documentation, condition, packaging, labelling, appearance, quantity and capacity, maintain segregation, and quarantine/escalate discrepancies.
HSEQ / Compliance	Provide assurance through audits, governance, review of NCR trends and verification of the effectiveness of the pre-acceptance and acceptance controls.



4. Waste Pre-Acceptance Checks

Every waste enquiry must undergo a documented pre-acceptance check before the waste is collected or received, unless an exceptional circumstance is specifically permitted by the applicable site arrangements. The check must be risk based and proportionate to the waste stream.

4.1 Information to be obtained

The pre-acceptance record must contain enough written or electronic information to enable the waste to be properly assessed and classified. As applicable, this includes:

- Waste producer - organisation name, address and contact details.
- Waste holder, where different from the producer, including relevant previous holder information.
- The source industry/business and the specific process that generates the waste.
- A clear description of the waste and how it becomes waste.
- Raw materials, products and chemicals used in the process, including current Safety Data Sheets where applicable.
- Nature and variability of the waste and of the process, including process changes and seasonal or operational variations.
- Physical form, appearance, colour/phase where relevant, odour and any known unusual characteristics.
- Expected composition and contaminants, supported by SDSs, representative samples, analytical information or other reliable evidence as appropriate.
- Existing waste classification, EWC/LoW code and previous classification information.
- Hazardous properties and relevant information on POPs where applicable.
- Potential for self-heating, self-reactivity, reactivity with moisture or air and other chemical incompatibility risks.
- The age of the waste, where relevant, including when it first became waste.
- Packaging/container type and any special packaging requirements.
- Expected quantity per load and expected annual quantity.
- Confirmation of whether a radioactive source or radioactive contamination could be present, where relevant to the waste and facility.
- Previous analytical results, previous acceptance/rejection information and relevant NCR history.
- Proposed recovery, treatment or disposal route and any route-specific acceptance criteria.

The Environment Agency's chemical waste appropriate measures specifically identify producer/holder details, source process, variability, description, EWC code, physical form, composition, hazardous properties, POPs, reactivity/self-heating, odour, age, packaging and expected quantities as pre-acceptance information.

4.2 Customer Waste Survey and supporting evidence

The Waste Consultant / Waste Sales Representative must complete the Customer Waste Survey with the customer and obtain all information reasonably necessary to support the technical assessment. A site visit should be arranged where the waste, process or information provided cannot be adequately understood remotely.

Supporting information may include SDSs, photographs, process descriptions, analytical reports, previous classification information and any other evidence needed to establish the waste profile. Documents must be forwarded to the Technical Support Office for review and controlled retention.

Where the information is incomplete, contradictory or insufficient to confidently characterise the waste, the waste must remain under technical hold while further information, sampling or analysis is obtained.

4.3 Environment Agency Pre-Acceptance Compliance Mapping

The following mapping demonstrates how Safetykleen's pre-acceptance checks address the Environment Agency appropriate measures for chemical waste and, where relevant, the corresponding non-hazardous and inert waste requirements. The mapping is intended to provide a clear audit trail between the regulatory expectation, the Safetykleen control and the evidence retained.

Environment Agency requirement	Safetykleen control	Evidence / ownership
Risk-based pre-acceptance before arrival, considering source, nature, hazardous properties, process/occupational/envirom	Sections 4.1 and 5 require documented source/process information, waste characteristics, hazards, previous-holder information and risk assessment before collection or receipt.	Customer Waste Survey, supporting evidence and TAR; Waste Consultant and Technical Support.



Environment Agency requirement	Safetykleen control	Evidence / ownership
mental risks and previous holder information.		
Obtain producer, source process, holder, variability and required waste-profile information in writing or electronically.	Section 4.1 sets the mandatory information set, including producer/holder, source process, variability, description, EWC/LoW, physical form, composition, odour, age, packaging and quantities.	Electronic pre-acceptance record and Customer Waste Survey; retained in the controlled technical record.
For chemical waste, establish composition, hazardous properties, POPs, self-heating/self-reactivity/reactivity, odour and radioactive-source information.	Section 4.1 requires these characteristics to be established and Section 5.1 requires consideration of uncontrolled reactions, gas evolution, corrosion, odour and environmental risks.	SDSs, analytical evidence, survey responses, technical assessment and TAR.
Obtain representative sampling/analysis where composition or variability is unclear, and record the reason where a pre-acceptance sample is not required.	Section 6 applies risk-based sampling; where a sample is not required, the reason must be recorded. Where customer-provided samples are relied upon, their representativeness and suitability must be documented.	Sample Declaration Form, sampling plan, laboratory report and technical review; Technical Support.
Technically assess suitability for storage/treatment, permit compliance and the intended recovery, treatment or disposal route.	Section 5.2 requires permit, capacity, compatibility, storage/segregation and onward-route confirmation before approval.	TAR, permit check, route acceptance and documented technical decision.
Reassess pre-acceptance information annually and sooner where the waste/process changes or received waste does not conform.	Section 11 requires annual reassessment and immediate reassessment following composition/process/raw-material changes, non-conformance, analytical failure or relevant regulatory/permit changes.	Review/amendment records, updated survey/TAR and NCR links; Technical Support.
Define and record the parameters to be checked at acceptance and the criteria for further testing, non-conformance or rejection.	Section 8 records visual, physical, chemical and odour checks, required tests and clear non-conformance/rejection criteria. Tolerances or action limits must be documented where a parameter is quantitative.	Acceptance checklist/profile and Waste Acceptance Procedure; receiving competent person.
Maintain pre-acceptance records for at least 3 years following receipt in a computerised/equivalent tracking system.	Section 12 requires electronic retention of the pre-acceptance evidence and linked technical records for at least 3 years following receipt, with longer retention where another legal or permit requirement applies.	Controlled waste acceptance/technical record; Technical Support / Compliance.
Maintain separation between commercial and technical approval and ensure final technical checks are independent of commercial considerations.	Sections 3 and 7 assign technical classification and approval to competent technical personnel and require independent technical review before approval.	TAR approval, technical review and competency records; Designated technically competent person.
Apply specific odour controls where wastes may release highly odorous substances such as mercaptans/VOCs, low molecular weight amines or acrylates.	Odour is assessed during pre-acceptance and acceptance. Where relevant, special handling, storage, containment and acceptance criteria are defined before approval.	Odour assessment, acceptance parameters and restrictions recorded in the TAR / waste profile.



5. Technical Classification and Suitability Assessment

The Technical Support Team / Technical Waste Assessor shall assess the waste using WM3 Technical Guidance Version 1.2.GB and applicable waste legislation. The assessment must establish the appropriate waste classification, EWC/LoW code, composition and concentrations, hazardous properties, physical form and the relevant recovery, treatment or disposal route.

5.1 Risk assessment considerations

- Process safety, worker safety and environmental risk.
- Odour, dust, emissions and other potential environmental impacts.
- Reactive chemicals, peroxide-forming substances, polymerisation hazards and self-heating potential.
- Incompatible chemical groups and potential reactions with other wastes or storage conditions.
- Storage temperature, ventilation, segregation and emergency response requirements.
- Container integrity, packaging and transport suitability.
- Availability and suitability of reception, quarantine and storage capacity.
- Permit restrictions and site-specific waste acceptance criteria.
- Suitability of the intended recovery, treatment or disposal route.

5.2 Permit and route confirmation

The relevant environmental permit must be reviewed to confirm that the waste is authorised for acceptance and storage at the intended Safetykleen site. The proposed onward recovery, treatment or disposal facility must also be capable and permitted to accept the waste and must confirm acceptance where required.

A waste stream must not proceed to collection or scheduling where it is not permitted, cannot be safely managed, lacks a suitable onward route, or presents an unacceptable health, safety or environmental risk.

6. Sampling and Analytical Verification

Sampling is a risk-based control within the pre-acceptance process. It is not a substitute for obtaining sufficient information from the producer, and it is not automatically required for every waste stream.

6.1 Sampling triggers

For chemical waste that Safetykleen will treat at its own facility, representative sampling and analysis must be obtained where required to demonstrate that the planned treatment will be safe and effective. Where a customer-provided sample is relied upon, the technical record must document why the sample is considered representative and suitable for the pre-acceptance decision.

- The waste has an unknown or uncertain composition.
- The waste is generated from a variable or uncontrolled process.
- Multiple waste streams or products have been mixed.
- The producer cannot provide sufficient supporting information.
- There is evidence of contamination or unexpected constituents.
- Existing analytical information is outdated or no longer representative.
- The appearance or characteristics differ from the declared waste profile.
- The process generating the waste has changed since the previous classification.
- A previous analytical failure, rejection or NCR has occurred.
- The Technical Department requires analytical evidence to complete classification.
- A receiving or onward treatment facility requires analytical confirmation.
- A representative sample is otherwise necessary to support permit acceptance or safe management.

These triggers are consistent with the Safetykleen Waste Sampling and Characterisation Procedure and Representative Waste Sampling and Recording Process.

6.2 Sampling controls

Where a representative pre-acceptance sample is not required, the reason for not sampling must be recorded in the pre-acceptance/waste tracking record. Any exemption from sampling does not remove the requirement for visual and documentary verification and must not be used where the waste cannot otherwise be adequately characterised.

Where sampling is required, a documented sampling plan must be established before sampling begins. The plan must define the waste population, sample locations and number of sample points, methodology, sample quantity, handling, preservation and transport, quality assurance and health and safety controls.



Representative sampling is particularly important for heterogeneous or variable wastes. Sampling should consider multiple locations, depths, containers, phases and fractions where necessary. A single grab sample is not considered sufficient for a mixed or variable waste stream. Sampling must be completed by trained personnel under the documented sampling process and technical oversight.

6.3 Laboratory analysis

Samples must be submitted to a competent external laboratory using recognised analytical methods. UKAS-accredited testing should be used where available, with formal chain-of-custody controls. The analytical suite must be determined by technical review and the expected contaminants rather than by applying an unsuitable generic suite.

Depending on the waste stream, analysis may include metals, petroleum hydrocarbons, volatile organic compounds, pH, flash point, organic contaminants, moisture content, reactive properties or other constituents relevant to the originating process. Analytical results must be reviewed by a technically competent person before approval.

7. Technical Approval and Pre-Acceptance Decision

Following completion of the pre-acceptance checks and any required sampling or analysis, the Technical Support Team shall complete the technical assessment and issue or update the TAR. The TAR and supporting evidence must provide a clear audit trail for the decision.

Decision	Control
Approved	Waste meets the pre-acceptance, classification, permit, route and safety requirements and may proceed to collection/scheduling subject to normal incoming load checks.
Approved with restrictions	Waste may proceed only subject to documented handling, storage, segregation, routing, quantity or other controls.
Further information required	Additional producer information, sampling, analysis or technical evidence is required. Waste remains on technical hold.
Rejected	Waste cannot be adequately characterised, is not permitted, cannot be safely managed or has no suitable route. It must not proceed to collection/acceptance.

Where sampling or analysis is required, results must be reviewed by a technically competent person. The review must consider sample representativeness, data quality, hazardous properties, classification, compatibility, permit constraints and treatment-route suitability. If uncertainty remains, further information, sampling or analysis is required before acceptance.

No waste is accepted until the applicable pre-acceptance requirements are complete and documented technical approval has been issued where required.

8. Defining the Incoming Acceptance Checks

When pre-acceptance is approved, the technical assessment must identify the parameters that will be checked when the waste arrives. These checks must be appropriate to the waste type and risk and may include visual, physical, chemical and odour-based checks.

- Waste description and producer details.
- Physical appearance, colour/phase and odour where relevant.
- Packaging, labelling and container condition.
- Quantity against the expected load/work order.
- EWC classification and transfer documentation.
- Any specific physical or chemical parameters identified during pre-acceptance.
- Storage, segregation and compatibility requirements.
- Any sampling or testing required on receipt.
- Clear criteria for identifying non-conforming waste and rejection.

The Environment Agency appropriate measures require operators to decide and record the parameters to be checked at the acceptance stage and the criteria for non-conformance or rejection.

Where an acceptance parameter is quantitative, the acceptable tolerance or action limit must be defined. The record must identify which results trigger further testing, technical hold, non-conformance or rejection. For wastes with



significant odour potential, the applicable odour acceptance criteria and special handling requirements must also be documented.

9. Link to Incoming Load Verification

Pre-acceptance approval does not replace the incoming load verification process. Every incoming load must be checked against the approved waste profile before it is allowed to proceed through the operational process. This must be recorded through the load check list on Evotix.

- The receiving competent person must inspect paperwork and supporting documentation.
- The producer, waste description and relevant work order information should be checked.
- The load must receive a visual inspection, including packaging, labelling, container condition and physical appearance.
- The waste must appear safe to unload and sufficient reception/storage capacity must be available.
- Incompatible wastes must be capable of remaining segregated, within the designated quarantine area.
- Any required tests or checks identified during pre-acceptance must be completed and consistent with expectations.

The current Waste Acceptance Procedure states that acceptance approval alone is not sufficient: every incoming load must be verified against the approved waste profile.

10. Non-Conforming Waste, Technical Hold and NCR

Any discrepancy between the incoming waste and the pre-acceptance information must be treated as a potential non-conformance. The affected waste must be segregated and placed under technical control while the discrepancy is investigated.

- Waste is not as described or does not match the approved waste profile.
- Waste does not conform to quotation caveats or restrictions.
- Labelling or transfer documentation is missing or incorrect.
- Packaging is damaged, leaking or unsuitable.
- Required sampling, testing or technical evidence has not been completed.
- The waste presents an unacceptable fire, chemical, environmental or safety risk.
- The classification or description is inconsistent with the information used for pre-acceptance.

The Non-Conformance Procedure for Waste must be enacted where appropriate. Quarantined waste must not be mixed or processed until the discrepancy has been investigated and formally resolved.

Where an NCR or previous acceptance failure has occurred, future waste from the affected customer/waste stream must be placed under the required sampling and verification controls. The fact that Safetykleen has collected the waste for months or years does not, by itself, remove the requirement for current evidence, representative sampling or technical review.

11. Review, Renewal and Change Control

Pre-acceptance information must be reassessed at least annually and sooner where there is a reason to believe the approved waste profile may no longer be representative.

- The waste composition changes.
- The process generating the waste changes.
- The raw materials or chemicals used in the process change.
- The waste received does not conform to the pre-acceptance information.
- A previous analytical failure, rejection or NCR indicates increased risk.
- Relevant legislation, permit conditions or receiving-facility acceptance criteria change.
- Existing analytical information becomes outdated or no longer representative.

The existing Safetykleen draft also specifies a one-year validity period for pre-acceptance/TAR information and requires a new Customer Waste Survey and updated TAR where the waste/process changes or the TAR expires. This procedure therefore adopts an annual review as the minimum control, with earlier reassessment whenever a change or non-conformance occurs.

The Environment Agency guidance similarly requires annual reassessment and earlier reassessment where the waste changes, the process changes, or received waste does not conform to the pre-acceptance information.



12. Records, Traceability and Retention

All information supporting the pre-acceptance decision must be retained in the controlled technical/waste acceptance record. Records must provide full traceability from customer enquiry through classification, sampling/analysis, approval, collection, incoming acceptance and any subsequent NCR or corrective action.

- Customer Waste Survey and pre-acceptance information.
- Supporting SDSs, photographs, process information and analytical reports.
- Waste classification records and WM3 assessment.
- Technical Assessment Reports (TARs).
- Sample Declaration Forms and sampling plans where applicable.
- Laboratory reports and certificates.
- Chain-of-custody documentation.
- Incoming load verification and acceptance records.
- Photographic evidence where relevant.
- NCR, investigation and corrective/preventive action records.
- Evidence of approval, restrictions, further-information requests or rejection.
- Records of review, amendment, deactivation and re-approval.

Pre-acceptance records should be held electronically where practicable and retained for at least 3 years following receipt of the waste, in line with the Environment Agency appropriate measures. If an enquiry does not lead to receipt, retention should follow Safetykleen's controlled records requirements.

The Representative Waste Sampling and Recording Process requires a dedicated sample record containing the Sample Declaration Form, laboratory analysis, Customer Survey, technical assessment records and supporting documents, stored on the Safetykleen controlled SharePoint/technical record system.

13. Competence, Governance and Audit

Personnel completing waste classification, technical assessment, sampling and acceptance checks must be trained and competent for the duties they perform. Competency records must be retained and available for audit.

- Technical classification and assessment must be completed by appropriately competent technical personnel.
- Sampling must be undertaken by trained personnel under documented procedures and technical oversight.
- Sampling, analysis and technical approval should be appropriately segregated to maintain independent technical review.
- Receiving personnel must be trained to identify and manage non-conforming loads.
- HSEQ/Compliance will provide assurance through internal audits, waste acceptance audits and review of NCR and analytical trends.

The Safetykleen characterisation procedure identifies defined technical approval authority, segregation between sampling, analysis and approval, escalation procedures for NCRs and ongoing compliance monitoring as core governance controls.

13.1 Continuous improvement

The procedure will be reviewed routinely and following significant regulatory, process or operational changes. Sampling frequencies, pre-acceptance trigger criteria, analytical schedules and acceptance checks may be strengthened where operational data, NCR trends, audit findings or regulatory feedback identifies a need.

- Number of waste streams requiring sampling or additional evidence.
- Laboratory turnaround performance.
- Acceptance, restriction and rejection rates.
- Classification amendments.
- Audit findings and corrective actions.
- NCR trends and recurring acceptance failures.
- Regulatory feedback and changes in guidance.

Conclusion

This procedure establishes a precautionary, evidence-led and auditable system for waste pre-acceptance checks. It aligns the initial customer and process information with WM3 classification, risk-based sampling and characterisation, technical approval, defined incoming acceptance checks and NCR controls.



The process is designed to ensure that Safetykleen knows enough about a waste before it arrives to determine whether it is technically and legally suitable for the intended facility and route. Where reliable characterisation or supporting evidence is not available, the waste remains on technical hold until the required information, sampling, analysis or approval is complete.

Document Control

Field	Detail
Document owner	Waste Director – Jade Bernard
Technical oversight	Designated technically competent person(s) – Serena Baker & Ruby Green
Compliance assurance	HSEQ – Sophie Wood
Review frequency	Routine review and following any significant process, regulatory or operational change; minimum annual pre-acceptance review
Records	Retained within the controlled waste acceptance/technical record in accordance with the applicable retention requirements

Related Procedures and Reference Documents

Environment Agency – Chemical waste: appropriate measures for permitted facilities, Section 3: Waste pre-acceptance, acceptance and tracking appropriate measures. Environment Agency – Non-hazardous and inert waste: appropriate measures for permitted facilities, Section 3: Waste pre-acceptance, acceptance and tracking.

- Safetykleen Waste Acceptance Procedure.
- Safetykleen Waste Sampling and Characterisation Procedure.
- Safetykleen Representative Waste Sampling and Recording Process.
- Safetykleen Non-Conformance Procedure for Waste.
- Customer Waste Survey and Technical Assessment Report (TAR).
- Waste Classification / WM3 assessment process.
- Transport, Classification, Documentation, Labelling & Packaging requirements.

