

**CUMBRIA WASTE GROUP**

**WI114: Pre-Acceptance of Hazardous  
Non – Hazardous Wastes**

**Date: 01/05/24**

<p>Originator</p>  <p><b>Transfer Station Manager</b></p>	<p>Approved by</p>  <p><b>Environment Manager</b></p>	<p>Authorised by</p>  <p><b>Director</b></p>
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**Issue 12**

**Review: 05/26**

**1.0 Objective**

To ensure that a system is in place at our Hazardous Waste Transfer Station(HWTS) and Liquid Waste Treatment Facility(LWTF) to prevent the acceptance of unpermitted or unsuitable wastes which may lead to adverse reactions or uncontrolled emissions, or leachate treatment plant failure. It also ensures that wastes are subject to appropriate technical appraisal in accordance with WM3, are suitable and financially viable for the proposed treatment or disposal route. It includes details of the pre-delivery checks noted in section 2.2 of the Golders document entitled ‘Waste Acceptance Procedure – Distington Landfill Site Liquid Waste Acceptance Facility’ Version A.5.

**2.0 Responsibilities**

- Full and complete enquiry information - CWG sales representatives
- Sample analysis - CWM chemists
- Technical appraisal - Technical Sales Manager /Transfer Station Manager

**3.0 Associated Documents**

- Chemical Waste: Appropriate Measures
- Distington HWTS Permit: QP3437SV
- Distington Landfill Site (incorporates LWTF) Permit: BV8725IT
- Waste Producer Declaration form (WPDF) (Distington HWTS & LWTF)
- Waste Pre-Acceptance Sample form
- CWM Laboratory Handbook
- WI104 Lab Chemicals: Quotation, Packaging, Transportation, Inspection and Storage.
- Quotation
- Golders’ document entitled ‘Waste Acceptance Procedure - Distington Landfill Site Liquid Waste Acceptance Facility’ (Version A.5)
- Groundwater Directive 2006/118/EC
- WM3

**4.0 Training and Competence**

The CWG sales representative fielding the disposal enquiry should if possible be qualified to HNC Chemistry or equivalent. If the CWG sales representative is not qualified to the above level, then all enquiries and quotations must be subsequently vetted by an appropriately qualified member of CWG.

A Chemist qualified to HNC Chemistry or equivalent must supervise the testing of the samples. The Transfer Station Manager must be qualified to HNC Chemistry or equivalent and be Technically Competent.

## 5.0 Procedure

5.1 Any prospective disposal enquiry should be directed to sales representative. The customer shall be requested to complete a WPDF (Distington HWTS & LWTF) as fully as possible, and supply any additional relevant waste information such as chemical analysis, manufacturer safety data sheets, sampling plan etc to support their classification & assessment in accordance with WM3. A representative sample of the waste will also be obtained from the customer if required (this can either be supplied by the customer, or by a CWG representative with sampling experience who may visit the customer site and personally take the sample).

The following information as a minimum shall be obtained in writing on the WPDF from the customer by the sales representative:

- Producer & Customer address and contact details;
- Description of waste;
- The type of process producing the waste (including SIC code);
- The specific process from which the waste derives;
- The quantity of waste;
- Chemical components of the waste (must show at least the generic chemical types as listed on the WPDF but ideally individual constituents and percentage composition should be specified if known);
- The form the waste takes (solid, liquid, sludge etc);
- Any Hazards (HP codes) associated with the waste;
- EWC code of the waste;
- Pre-acceptance sample details: location - e.g. from tank/drum/pit/skip etc, method of sampling - e.g. core sample/from tap/dip sample etc, number of containers involved and number sampled, person responsible for taking the sample;
- Any necessary pre-acceptance sample storage conditions / preservation techniques.
- If WPDF is not adequately completed then Sales Rep will speak with the customer to gain more information.

In respect of non-hazardous liquid waste destined for the LWTF, the following additional information will be detailed on the WPDF as per sec 2.2 of Golders document 'Waste Acceptance Procedure – Distington Landfill Site Liquid Waste Acceptance Facility' Version A.5:

- a) Are any List 1 substances (hazardous substances as determined under Groundwater Directive 2006/118/EC) or other biocides used in the process from which the waste arises?
- b) Does the process from which the waste arises produce any List 1 substance or other biocide either as the main product or as a by-product?
- c) Are any List 1 substances or other biocides used in the cleaning or lubrication of the equipment used in the process that produces the waste?

If the answer is 'yes' to any of these questions, details will be taken and attached to the WPDF.

Note: certain waste types do not require a pre-acceptance sample, these include:

1. Laboratory smalls in containers of 5 litres or less;
2. Pure product chemical or aerosol, i.e. unused/unwanted/out of date/out-of-specification products for which a safety data sheet has been obtained (does *not* apply to products which have been contaminated/diluted with other materials);
3. Packaged cosmetics & pharmaceuticals;
4. Contaminated rags/wipes/clothing etc do not need analysed but the contamination of the waste needs to be specified;
5. Waste Oil e.g. used combustion engine oil, gearbox oil, mineral lubricating oils, oils for turbines, hydraulic oils from a large number of small sources i.e. garages that is going for treatment.
6. 'Articles': includes batteries, light tubes, WEEE, end-of life vehicles or parts of vehicles, metal waste & scrap metal;
7. Solid non-hazardous waste (except for mirror entries when waste composition is unknown)
8. Contaminated wood & roofing material
9. Asbestos;
10. Oil/water interceptor wastes where the interceptor has not been affected by a spillage;
11. Emergencies: if a waste requires emergency removal the operator can receive it without pre-acceptance sampling and analysis.

**5.2** The pre-acceptance sample, completed WPDF and any associated paperwork such as safety data sheets, customer chemical analysis, etc will be assessed by a CWG technically qualified person. If the information provided is insufficient they will inform sales representative, if customer can provide further information.

The technically qualified person will decide on any specific analysis and inform the Chemist. On receipt of the sample at the laboratory, a Waste Pre-Acceptance Sample form will be completed by the receiving Chemist; each sample will be given a unique reference number to track the material throughout its life and enable cross referencing with acceptance samples from any subsequent incoming loads. The tracking number will be written on the pre-acceptance sample container.

The Waste Pre-Acceptance Sample form will also include:

1. Producer and waste details as detailed in the WPDF (listed in section 5.1), but with the exception of the detailed Chemical components section;
2. Analysis section (see 5.4 below) which will be compared against the submitted WPDF for consistency;
3. A check on the EWC code declared by waste producer/holder to ensure permitted waste;
4. Proposed disposal/recovery route which will ultimately be authorised by the assessor.

5.3 Analysis required will vary depending upon the nature of the waste, the disposal/recovery route to be used, and what chemical information is already known or suspected about the waste. The checks made can include any combination of the following:

- Physical state/appearance;
- Odour assessment;
- pH;
- Water content;
- Suspended solids;
- In respect of liquid waste destined for the LWTF, Strathkelvin Toxicity testing;
- Presence of oxidants;
- Acidity and alkalinity;
- Water reactivity
- COD;
- Nutrients – NH<sub>4</sub>-N, NO<sub>3</sub>, NO<sub>2</sub>;
- Flammability and Flashpoint;
- Presence of sulphide;
- Presence of cyanide;
- Toxic/heavy metals;
- List I and List II substances (hazardous substances and non-hazardous pollutants as determined under Groundwater Directive 2006/118/EC);
- Other substances of environmental significance such as Persistent Organic Pollutants.

On site tests may be carried out for the procedures identified in CWM Laboratory Handbook, all other analysis must be sent to an external suitably accredited laboratory.

5.4 Following completion of 5.2 and 5.3, the waste shall be technically assessed by the Transfer Station Manager or Technical Sales Manager.

The technical assessment shall:

- a) Ensure that the EWC assigned to the waste is an accurate reflection of the waste and that the assessment stated in WM3 is followed with any evidence of the hazardous/non-hazardous nature of the waste recorded in the customer folder.
- b) Ensure that the material is permitted by reference to the HWTS permit, or LWTF (Landfill) permit ;
- c) Confirm as far as possible that the waste characteristics match the WPDF
- d) Confirm final disposal route and costs are available and acceptable.
- e) Establish a sampling plan stating frequency of re-testing required.
- f) Establish determinant limits & variances.
- g) All caveats are listed for disposal
- h) Organic peroxides with an SADT must have the SADT listed in the caveats

If the requirements of a), b) and c) above are satisfied, then the Pre-Acceptance Sample form will be signed off by the assessor and the mastersheet completed for the waste in the customer folder including any caveats to enable disposal. Customer Quotation shall be raised on the Pre Acceptance Waste Declaration and emailed to the customer in a PDF form.

Once the Quotation has been raised and accepted by the customer, the booking process can then begin (WI112)

Copies of the WPDF, Waste mastersheet, Pre-Acceptance Sample form and Quotation will be filed together in the customer folder on the network and the mastersheet will then be used to raise individual quotes and bookings via the selection page moving forward.

If there is no profitable or technically feasible disposal route available, or the physical capacity/on site resources are not available to manage the waste, CWM will reserve the right to decline to offer a quotation for the material.

**5.5** Where enquiries are received for laboratory smalls, a full copy of the list and the packing lists are required. This is assessed to set a disposal price and raising a quotation. If CWM staff are to pack the lab smalls then working instructions WI104 must be adhered to. If CWM accepts laboratory smalls packed by a third party then they must be asked if they are aware of EA document Chemical Waste: Appropriate Measures, and if not, a copy must be sent to them and chemicals should be packed accordingly. They must also be given a copy of WI104 and pack and segregate accordingly.

**5.6** All records raised by the enquiry are maintained in hard copy at HWTS for a minimum of three years. Samples appertaining to the enquiry shall be stored for a minimum of three months, or until the material has left the site if this is longer.

## **6.0 Pre-Acceptance of Waste Oils.**

**6.1** Pre-acceptance information should be obtained before the waste arrives on site. Arisings of waste oil will be appraised as other liquid wastes. Waste oils that do require a representative sample include:-

1. Industrial sites that do not normally produce waste oil;
2. Other sources where chemicals & potential contaminants may be handled e.g. chemical manufacturing;
3. Product (which may cause dioxin formation if used in subsequent combustion process);
4. Tank bottom oil sludges;
5. Effluent;
6. Any waste oil that has become contaminated e.g. by solvents, petrol or PCB's. If it is deemed necessary, this will be done prior to acceptance which will necessitate sending a representative sample to a suitably accredited laboratory and the subsequent results being attached to the Waste Pre-Acceptance Sample form.

**6.2** Where waste oils or oil-bearing wastes are to be collected from "low risk sources" e.g. garages, workshops, commercial premises or industrial processes where the waste is likely to be similar each time, a pre- acceptance sample will not normally be required.

## **7.0 Review period for pre-acceptance samples/information**

For 'one-off' waste loads, or if a regular waste stream is particularly variable, then pre-acceptance sampling and analysis must be done before receipt of every individual load.

Even for relatively consistent wastes it is recommended that pre-acceptance samples and information are reviewed/renewed at least annually – the operator can use a sample received at acceptance for this purpose.

Issue 12 – Full review, numerous changes