

Site Clear Solutions Limited Compliance Statement – Storage Location Justification

Site Clear Solutions operates under a flexible, risk-based storage system designed to maintain compliance with Environment Agency guidance while ensuring safety and operational efficiency. Where waste treatment and storage is standard, it will follow the Environment Agency's appropriate guidance, however, due to the variable nature of incoming wastes, ranging from small containers (5L or 25L drums) to IBCs or large bins, and the need for treatment decisions based on condition (e.g., separation of liquids and solids) it is not always practical or safe to assign fixed storage locations for each EWC code. As an example, with something like a sludge or an oil spillage, it might be that liquids would be skimmed off for disposal in an IBC or a 240l drum, and then there would be thick sludge at the bottom that would need disposing of separately.

Instead, wastes are stored in designated bays (such as Bays 5, 6, and 15), which allow controlled segregation and operational flexibility. Segregation of incompatible wastes is achieved through a combination of physical separation, containment measures, and expert supervision. Reactive or incompatible wastes, which occur in very small volumes, are managed in a dedicated chemist-controlled area with additional containment measures (for example, storing a 25L drum inside a 240L drum on its own pallet). This approach ensures segregation and containment while meeting the Environment Agency's appropriate measures guidance.

Site Clear Solutions employs both a COTC holder and an on-site chemist who are very experienced, assess all wastes arriving to the site and are highly knowledgeable in identifying reactive or incompatible wastes and applies expert judgment to ensure safe segregation and compliance with regulatory requirements. This includes assessing chemical properties, applying compatibility checks, and implementing enhanced containment for high-risk materials. Where necessary, wastes are double-contained and isolated from other streams to prevent any interaction. This expertise is critical for managing unusual or complex waste streams and ensures that any reactive materials are handled with appropriate precautions.

It should also be noted that the majority of incoming waste streams (>90%) are not highly toxic or hazardous in nature and do not require specialist chemist intervention. These wastes may arrive in various container types or mixed loads, requiring separation or processing using best available techniques. Only a small minority of wastes require specialist expertise, and this is where Site Clear Solutions' chemist-led approach works effectively to manage and mitigate risk throughout the process and storage until disposal.

Summary of Segregation Controls in Place

- Dedicated storage bays for hazardous and non-hazardous wastes.
- Chemist-controlled area for reactive or incompatible wastes.
- Double containment for high-risk materials (e.g., small drum inside larger drum).
- Physical separation using pallets, bunding and barriers.
- Compatibility checks performed by the on-site chemist before storage.
- Documented procedures for segregation and handling of incompatible wastes.
- Regular inspections and audits to verify compliance with segregation protocols.

This dynamic approach ensures that all wastes are stored securely, segregated appropriately, and handled in accordance with EA guidance (Chemical Waste: Appropriate Measures, Sections 4 & 5), while avoiding unnecessary risk associated with rigid storage mapping.