DOW CORNING LTD

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1. Waste Transfer Operations.

1.1. Waste Transfer Station Construction.

The whole area is of a reinforced concrete construction (RC40 strength) to a thickness of 250mm. Reinforcement bars are 20mm high yield bar laid at 150mm centres in each direction. The concrete is laid on a 1000g Visqueen membrane. All joints are fitted with hydrophilic waterstops which expand into voids on contact with water. The base is laid on a 150mm type 2 sub base. The whole area is bunded and protected by a central chemical drain. The whole area falls towards this drain. Where the bund is not complete (to allow for access) there is another chemical drain which connects to the central drain. All chemical drains flow to a $2m^3$ sump prior to connecting to the main Dow Corning site sewerage system. Any material that could be spilled at the Waste Transfer Station would be collected in the sump and the drains.

1.2. Waste Transfer Station Layout.

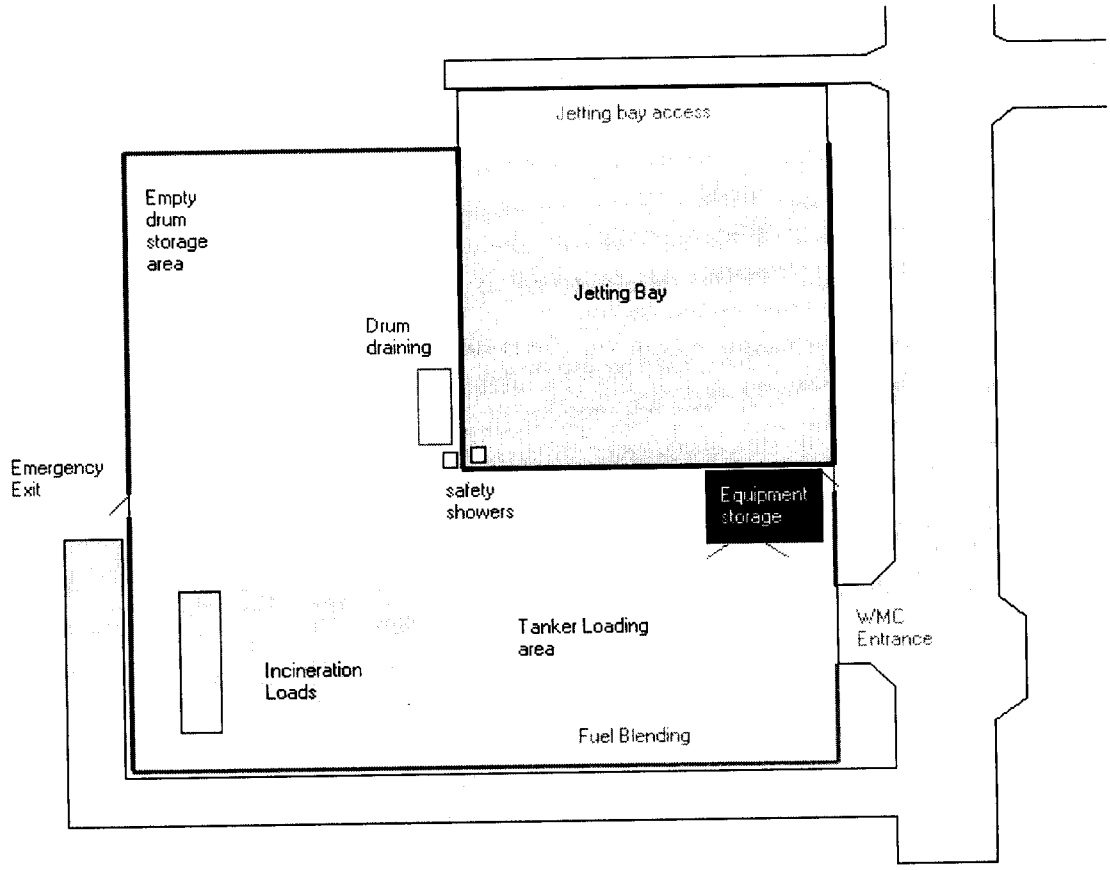


Figure 1: Waste Transfer Station Plan 1

1.3. Operations.

This section deals with the operations that are carried out at the new Waste Transfer Station by the waste handling personnel. The focus is to inform the reader what actions are carried out within the WTS and give a detailed view of the responsibilities referring to the handling of materials once they have been collected by waste handling personnel.

The waste handlers off load the waste into the WTS. No other persons are allowed to move materials into the WTS area. They then log the amount of waste into the tracking sheet as below:

Date	Customer	Description of the Material	Route	No of IBCs	No of Drums	Import Info	Export Info

Figure 2: Example of the Waste Tracking Sheet

Most of the above information can be gained from the transport documentation. For unlabeled waste, the waste non-conformity procedure should be followed.

The waste is stored in the designated storage location for wastes of similar properties, so that the material can be disposed of correctly if necessary. (Refer to Figure 1.)

1.4. Draining Procedures.

In order to ensure that empty packaging items are nominally empty we have developed an effective drainage system to guarantee contract and transport regulations are met. This procedure details how nominally empty containers (<1 % liquid) would be handled to ensure that they could be disposed of with the other empty drums. The containers would be prepared within the WTS and moved to their storage area to await transportation off-site. All containers in the drum draining area need to be drained at the draining area using the spill trays.

1.4.1. Drums

The procedure would be as follows:

- Identification of the contents of the container. If these are in doubt the WTS Co-ordinator should be consulted for the appropriate course of action.
- Drums should be manually handled across to the draining point.
- The earthing rod should be placed into the liquid of the receiving drum.
- The earthing strap bonding the drum being drained to the receiving drum should be fitted. The drums are now ready to be upturned and their contents blended,

ensuring that the receiving receptacle has enough volume left for material from the above container.
- All drums would be blended to different categories depending on their properties.
- The prepared container should remain labelled.
- The empty containers should then be palletised and moved to the WTS storage area to wait for off-site recycling.

1.4.2. IBC's

The procedure would be as follows:

- Identification of the contents of the container. If these are in doubt the WTS Co-ordinator should be consulted for the appropriate course of action.
- The container should be moved to the draining area.
- The elbow jointed pipe end should be attached to the valve of the container to be drained with the other end being firmly attached to the receiving receptacle's vessel top.
- It should be ensured that the receiving receptacle has enough volume left for material from the above container.
- The top container should be vented before opening the valve and commencing draining.
- It should be guaranteed that the material is draining adequately before leaving the area.
- When the containers are empty the drainage pipes should be disconnected and the valve and top sealed.
- The label should be left on the container.
- The empty container should then be moved to the WTS storage area to wait for off-site recycling.

1.5. Procedures.

1.5.1. Waste Movement

- The waste is transported into the WTS.
- The driver observes the speed limit of 15m/h (25 km/h) during the transport.

1.5.2. Waste Unloading

This operation is only performed if the no other loading operation is performed in the WTS.

- Once the vehicle has arrived in the WTS, it would be parked up safely.
- The waste would be taken from the vehicle with an FLT and is brought to the desired storage location.

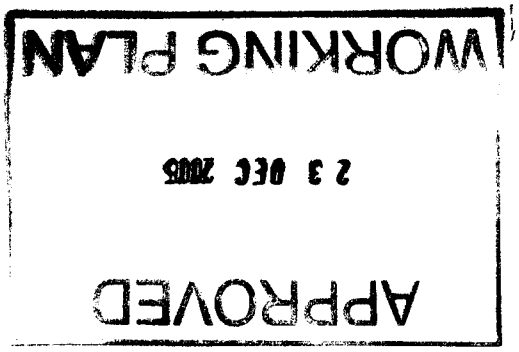
1.5.3. Spill response

- In the event of a spill the WTS operative must report it immediately to their Supervisor.
- Depending on the volume of the spill the following actions should be considered.
  - Utilisation of the WTS spill kit
  - Utilisation of the DC plant protection team and or BERT crew.
  - Notification of the incident to the site shift manager (Alpha 1)

1.6. Hours of Operation.

The Waste Transfer Station will only accept or transfer wastes during the specified times.

Monday to Friday between the hours of 08:00 and 17:00

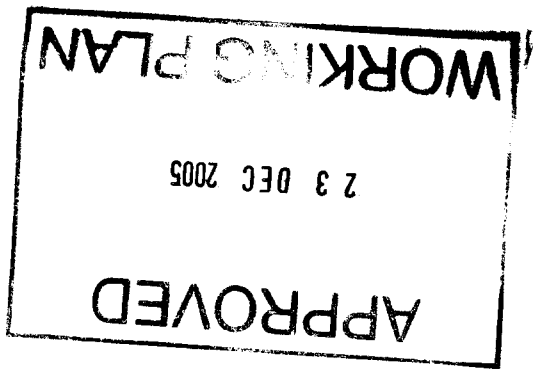


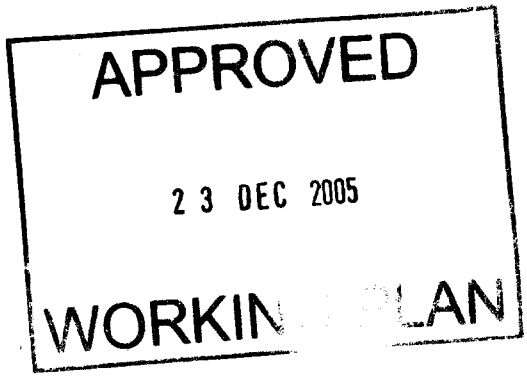
2. Procedure for Tracking of Materials

Upon arrival, all loads will be checked against supporting documentation. Any non conformities, such as incorrect labelling, packaging or quantities will be reported to the Waste Transfer Station Co-ordinator and reported back to the company where the waste originated from. If necessary, the relevant authorities will be informed.
Once happy that the load received matches the paperwork, the load will be unloaded and stored in the designated storage area, which is defined by floor markings. The load will be separated into relevant categories, depending on its next route.
Waste coming into the Station will be recorded on to the tracking sheet by the waste handlers. This will then be given to the Waste Co-ordinator, who will input the data on the Waste Transfer station spreadsheet.

Date	Customer	Description of the Material	Route	No of IBCs	No of Drums

Figure 3: Example of the Incoming Waste Sheet

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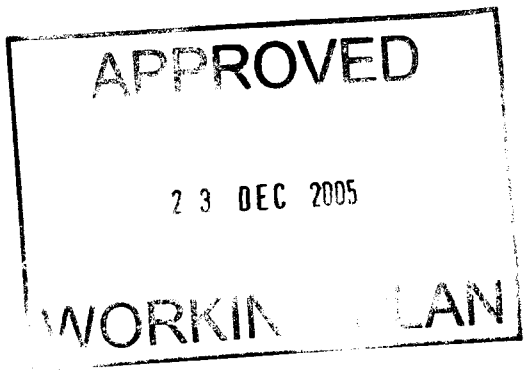
3. Inspections

3.1. Concrete Hardstanding.

The concrete area is inspected at 5yr intervals, with the most recent inspection being done in May 2005. All records of inspections and any remedial actions that were recommended are stored at the Engineering Department on site.

3.2. Drainage System

The drainage system and interceptor are not currently on a testing schedule, but this has been highlighted and will be included as an improvement item in our IPPC application. All records of future inspections and any remedial actions that are recommended will be stored at the Engineering Department.



4. Equipment Maintenance.

4.1. Safety Showers.

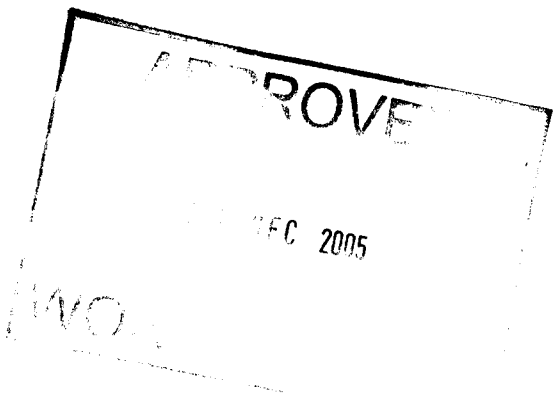
The Waste Transfer Station has a heated safety shower for use in the event of chemical splash to personnel. This shower is hard wired back to the central gatehouse on site which when activated, sounds an alarm that will initiate a response from the Emergency Response Team. It is tested weekly and records of testing are kept in the Environmental Office on site.

4.2. Drum Crusher.

There is a mechanical drum crusher in the area which is used to crush empty drums for recycling. This is on a preventative maintenance schedule and records of maintenance are kept in the Engineering Department on site.

4.3. Forklift Trucks.

All forklifts that operate in the area are maintained by a contract company on site. All vehicles are checked daily and records of these checks are kept in the Environmental office. All maintenance activities carried out are recorded and records are kept with the contract company.



5. Drainage and Containment.

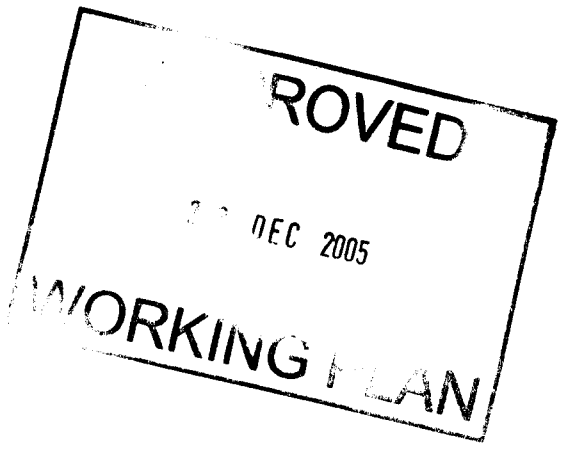
In the event of any spillages from containers or a total loss of containment from containers, the whole Waste Transfer Station is fully contained. The whole area is bunded and protected by a central chemical drain, which falls towards this drain. Where the bund is not complete (to allow for access) there is another chemical drain which connects to the central drain. All chemical drains flow to a $2m^3$ sump prior to connecting to the main Dow Corning site sewerage system. Any material that could be spilled at the Waste Transfer Station would be collected in the sump and the drains.

6. Actions for dealing with Non Conformities.

Any non conformities that are detected with the materials that are brought into the Waste Transfer Station will be recorded internally and reported back to the company that produced the material. If necessary, the issue will be reported to the Environment Agency.

Examples of non conformities are: (This list is not exhaustive)

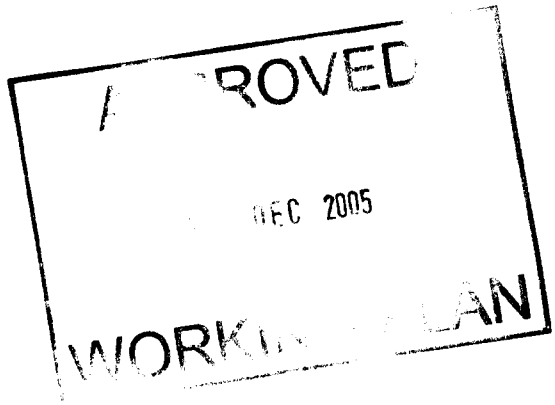
- Incorrect labelling.
- Incorrect documentation.
- Materials differing greatly from the descriptions provided.
- Incorrect packaging.
- Damaged packaging.



7. Intended Acceptable EWC Codes.

List of EWC codes allowed at the Waste Transfer Station:

060101*	Sulphuric acid and sulphurous acid.
060502*	Sludges from on-site effluent treatment containing dangerous substances.
060802*	Waste containing dangerous silicones.
060899	Silicone waste not otherwise specified.
070104*	Organic solvents, washing liquids and mother liquors. (basic organic chemicals)
070204*	Organic solvents, washing liquids and mother liquors (synthetic/man-made)
070216*	Wastes containing dangerous silicones (plastic/synthetic/man-made)
070217	Wastes other than mentioned in 070216*
070604*	Organic solvents, washing liquids and mother liquors. (From MFSU Soaps/cosmetics)
070699	Wastes not otherwise specified in 07 06
080409*	Waste adhesives and sealants containing organic solvents or other dangerous substances.
080410	Wastes not otherwise specified in 08 04 09*
080499	Wastes not otherwise specified in 08 04
130308*	Synthetic insulating and heat transmission oils.
130310*	Other insulating and heat transmission oils.
150103	Wooden packaging.
150104	Metallic packaging.
150105	Composite packaging.
160601*	Lead batteries.
160602*	Ni-Cad batteries.
160605	Other batteries and accumulators.

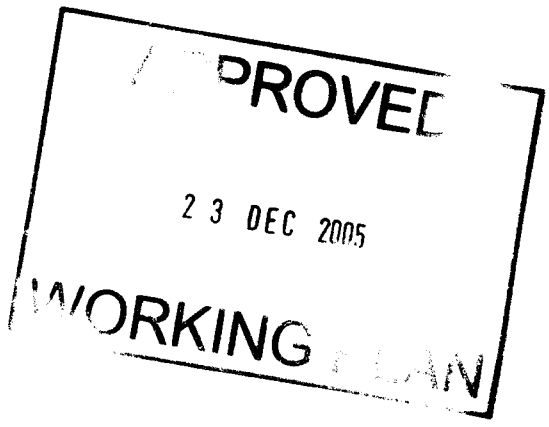


8. Proposed Blending Facility

In the future, a blending facility is likely to be constructed in the Waste Transfer Station Area. The purpose of this blender would be to enable wastes to be treated in order that they may be recycled either on or off site.

This blending facility would consist of a free standing tank or tanks which would allow the bulking up of similar materials to a specification acceptable for recycle. The facility would be contained within a separate bunded area which would satisfy current regulations. The facility would run under an inert atmosphere and any electrical equipment would be classified for duty in the relevant zoned areas. Drum off from the facility would be via a lance assembly and would be fully earthed and bonded according to the current relevant legislation. Any containers containing material that would be charged to the blending facility would be thoroughly drained. They would then be moved to the relevant empty container storage area for recycling.

As and when this facility is constructed, the relevant changes to this working plan will be drawn up and agreed with the relevant authorities.



9. List of Relevant People.

Name	Title	Date of Birth
Margaret Matthews	Managing Director	28/06/1960
Peter Cartwright	Director	13/12/1962
Edward Rochford	Company Secretary	07/12/1946