


TRAWSFYNYDD SITE

SITE INSTRUCTION

TRAWS-SI-WMD-002

Issue 09

Management of Hazardous and other Controlled (Non-radioactive) Waste	
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Revision History

Issue Number	Revised by	Reason for Revision
1	N/A	New document giving overall arrangements for management of hazardous and other Controlled (non-radioactive) Waste. Replaces MCP-16-010 i10 -Management of Controlled Waste.
2	J E Owen	So as the Site instruction refers to the new company standard documents TRAWS-WMDD1-016-3203 and addition of inert waste procedure.
3	T Williams/J E Owen	Incorporate recommendations of red brief following Harwell event and the new S-100 reviewed company document.
4	J E Owen	To ensure the requirements of PD-026 are met and to update other document changes.
5	J E Owen	To include the procedure for the use of the Siltbuster unit, and in response to an audit which changed 4.2.6:- waste must be recorded in a log rather than individually labelled.
6	J E Owen	General review to reflect the amended S-100 including amendment of role titles and responsibilities to reflect S-100 – ASQEP-W and Waste Supervisor
7	G Forbes	General review and additional clarification of tasks completed by Waste Supervisor and ASQEP-W. Inclusion of specific waste streams; sewage and green waste; and process map
8	G Forbes	Inclusion of management of hazardous wood and minor amendments.
9	C Williams	Review and update after internal audit.

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1. Purpose

To produce a working site document from company standard S-100 Management of Controlled Waste (Ref 6.1) and process document PD-026 Management of Waste (Ref. 6.2). This document is to be read in conjunction with S-100.

- 1.1 The purpose of this instruction is to document all necessary information and procedures which enable the Site to conform with all the requirements of the Hazardous Waste (Wales) Regulations 2005 (Ref. 6.3), The List of Wastes (Wales) Regulations 2005 (Ref. 6.4), The Environmental Protection Act (EPA) 1990 (as amended) (Ref. 6.5), Waste Electrical and Electronic Equipment Regulations 2013 (Ref. 6.6), Waste (England and Wales) Regulations 2011 (Ref. 6.7), Control of Asbestos Regulations 2012 (Ref. 6.8), The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009 (Ref. 6.9), and the Waste Separation Requirements (Wales) Regulations 2023 (Ref 6.10).
- 1.2 The EPA imposes a duty of care on all holders of controlled waste, breach of this duty being a criminal offence.
- 1.3 As a producer of controlled waste it is necessary to have adequate arrangements for the,
 - Safe and secure storage of waste;
 - Transfer to the right persons;
 - A suitable record of the transfer.

2. Scope

- 2.1 This procedure applies to all non-radioactive waste, which is known as CONTROLLED waste owned by the company and produced on behalf of the company. This includes, waste produced or managed by the Company's sub-contractors, including projects managed under The Construction (Design and Management) Regulation 2015 (Ref. 6.11) and waste managed by the company under tenancy agreements.
- 2.2 The arrangements for determination of whether wastes are radioactive or not, i.e. 'In Scope' or 'Out of Scope' of the Environmental Permitting Regulations (EPR) 2016 (Ref. 6.12) (and subsequent amendments) based on their radioactivity content, are given in TRAWS-LSI-14-3-045 (Ref. 6.13).
- 2.3 This Instruction includes the methods adopted for the identification, storage treatment and disposal of controlled waste together with all associated records.
- 2.4 For England and Wales, Non-radioactive (i.e. 'Out-of-Scope') controlled waste falls into three categories:
 - Hazardous waste e.g. oils, paints, asbestos
 - Non-hazardous waste e.g. general, cardboard, timber, organic green waste

- Inert waste e.g. stone, concrete, bricks.

EXCLUSIONS

- Discharges to atmosphere.
- Assets which are defined in S-125 Management of Redundant Assets (Reg 6.14)
- Wastewater discharged direct to sewer or the environment
- Radioactive waste other than out of scope waste

3. Responsibilities

3.1 Site Director

Responsible for ensuring that the site has management systems, organisational structures and resources that are sufficient to achieve compliance with S-100 (Management of Controlled Waste) and applicable regulatory requirements.

3.2 EHSS&Q Manager

Ensuring that data and records relating to non-radiological wastes are managed in accordance with permit conditions and regulatory requirements.

Assuring that all transfers, discharges and disposals are permitted and performed in compliance with the conditions of the relevant permit.

The EHSS&Q Manager shall be the sole arbitrator of any disputes regarding the off-site disposal of waste.

3.3 ASQEP-W

Responsible for reviewing and assuring satisfactory site wide procedures for the management of Controlled Waste, to fill and send the pre-treatment confirmation form to the Environment Agency / Natural Resources Wales (NRW).

Undertake the duties required of an ASQEP-W as per company standard S-100.

Responsible for ensuring that all consignment documentation is correct and that the consigned waste corresponds to the paperwork before it leaves site. The ASQEP-W will physically check the load if need be if he/she is not satisfied with all the consignment documentation.

Ensuring that investigations into consignments that have been rejected by the disposal site are undertaken and that appropriate action has been taken. The rejected load will be brought back on to site and stored in the Rejected waste area in the waste compound whilst the investigation is under way.

The ASQEP-W has the final decision as to whether any waste leaves the site.

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3.4 Head of Waste

Establishing arrangements to ensure that all wastes, specifically incompatible wastes are segregated at source.

Ensuring there are sufficient SQEP resources to manage the disposal of controlled waste, nominally ASQEP-Ws and Waste Supervisors.

Ensuring that the site apply the Waste Hierarchy to ensure that re-use and recycling is maximised and disposal to landfill is minimised. (See Section 7.5 The Waste Hierarchy).

Ensuring that waste leaving the site has been cleared in accordance with S-051 Assessment, Control and Radiological Clearance of Material and Waste (Ref. 6.15)

Arranging for prompt disposal of waste from site.

Ensuring that waste skips entering the site are appropriately checked and are fit for purpose.

Ensuring as far as reasonably practicable that segregated waste disposal bins, skips and areas do not contain any non-compliant items prior to dispatch (e.g. hazardous material in a non-hazardous disposal).

Inspecting skips / disposal vehicles prior to dispatch to ensure the waste is appropriately contained, covered and restrained.

Ensuring details of the receiving site's EPR permit (if facility is in England and Wales) or Waste Management Licence (if facility is in Scotland), waste broker, carrier registrations and other appropriate documents are updated and made available to the Waste and EHSS&Q departments, and that copies are retained for a period of three years after disposal.

Ensuring that the site has registered with NRW as a Hazardous Waste Producer and has received a premises code.

Ensuring that any pre-treatment processes that require permitting are appropriately authorised.

Ensuring that all hazardous waste is pre-treated (only by sorting and segregation) prior to disposal to landfill, incineration or recycled.

Requesting the return of the completed consignment note from the final disposal site to provide evidence that hazardous waste has been disposed of correctly.

Undertaking investigations into consignments that have been rejected by the disposal site and take appropriate action. (Note: Carried out in conjunction with the ASQEP-W)

Responsible for the review and amendment of this instruction.

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Identify the waste management treatment facility for the waste, ensuring they have been approved by NRS under the requirements of S-385 Waste Management Facility Duty of Care Programme.

3.5 **Commercial Specialist**

Responsible for dealing with the financial interface with waste contractors. The commercial specialist also authorises the release of redundant assets for use as specified in S-125 Management of Redundant Assets.

3.6 **Project Waste Engineers**

Responsible for assuring that controlled waste (hazardous and non-hazardous) is adequately identified, stored and handed over to the Waste Operations Department for disposal, from their respective waste areas.

3.7 **Waste Supervisor**

Responsible for supervising the routine operation of the waste compound, ensuring it is being correctly used and safely operated at all times. The Waste Supervisor shall ensure that all persons using the waste compound complies with the appropriate procedures and that any required maintenance is carried out as per written instructions.

Responsible for oversight of waste skips external to the waste compound.

The Head of Waste and the ASQEP-W will assess the competence of the Waste Supervisors in regard to waste management particularly, those who will sign Transfer and Consignment Notes. This decision must be recorded on form F-296 - *Waste Supervisor Record* and retained by the Head of Waste.

3.8 **Facilities Contract Manager**

The relevant Contract Manager is accountable for overseeing the collection and disposal of office, canteen, mess room and other waste left in suitably designated locations in accordance to advice from the ASQEP-W or Head of Waste.

3.9 Other responsibilities are described in the procedure.

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4.0 Procedure

4.1 General Requirements

4.1.1 Controlled waste will be managed in accordance with S-100. This instruction is designed to provide additional detail in respect of site procedures and should be read in conjunction with S-100.

ACTION: All staff

4.1.2 This procedure applies to all waste produced on-site including waste produced by contractors. This applies to projects managed under The Construction (Design and Management) Regulation 2015.

ACTION: All staff

4.1.3 The waste hierarchy (see section 7) shall be applied:

Prevention > Preparing for re-use > Recycling > Other recovery > Disposal.

ACTION: All staff

4.1.4 Consider if redundant assets can be redeployed as per S-125 prior to deciding they can be discarded.

ACTION: All staff

4.1.5 During planning of any work giving rise to waste consideration should be given to how the waste will be managed. Work shall not commence until a disposal route has been identified and agreed with an ASQEP-W who will typically sit in the Waste Operations or Environment team.

Advice will be formally captured in a Project Waste Management Plan (PWMP) F-470, even if the work is not governed by the project gating process. A PWMP may not be required for routine operational or maintenance activities where there is an obvious disposal route for the waste via the waste compound. This does not apply to hazardous waste, an ASQEP-W shall be consulted prior to handing over this waste type. Designated storage areas, labelling for wastes and waste containers will be specified in the PWMP along with handover arrangements.

The Head of Waste should be consulted on the requirement to produce a PWMP.

ACTION: All staff

4.1.6 Adequate time shall be given to allow for any characterisation of waste to be completed prior to the generation of any waste. Consideration must be given to the production of waste sampling plan, analysis timeframe, and interpretation of results. The requirement for characterisation will normally be captured in the PWMP.

ACTION: Project Manager

4.2 Clearance of Waste

4.2.1 All waste shall be cleared in accordance with LSI-14-3-045 before transfer to the waste compound. The Waste Generator is responsible for obtaining advice from an ASQEP-M on any clearance arrangements

The management, control, and clearance of waste should be considered at the planning stage prior to work commencing.

The Waste Processing Building is the default clearance route for all potentially non-active waste leaving the RCA and will be managed by Waste Operations

unless alternative arrangements are in place via the PWMP or for specific waste types i.e. asbestos contaminated materials.

ACTION: All staff

4.3 **Waste Compound**

4.3.1 The preferred disposal route for controlled waste is via the site's waste compound.

ACTION: All staff

4.3.2 A set of keys will be held and controlled by the Day Ops Lead for emergency access to the facility. These keys will not be released for routine operations within the facility.

ACTION: Head of Waste

4.3.2 Waste skips located in the waste compound are managed by Waste Operations. Skips shall be suitably labelled to identify the permissible content – see appendix D

The compound shall be kept locked and access controlled by the Waste Team Leader. Access for loading contents into skips must be done under the supervision of a Waste Supervisor and the skip contents log F-834 completed by either the person responsible for the waste or the Waste Supervisor.

The Waste Supervisor shall verify the contents of all containers recording the method used on the F-834.

ACTION: Waste Supervisor

4.3.3 Confirm that all waste coming into the waste compound has a completed clearance certificate - TRAWS-F1083 (198-HPR-134), confirming it is non-radiological waste.

NO WASTE WILL BE ALLOWED INTO THE WASTE COMPOUND WITHOUT THE CORRECT DOCUMENTATION see 4.2.1

ACTION: Waste Supervisor

4.3.4 Scrap metal is controlled waste, although income will be derived from its sale. All scrap metal must be segregated from other waste and placed in the appropriate skip. This applies to scrap metal managed external to the skip compound.

ACTION: Waste Supervisor

Note: Site vehicles which are no longer roadworthy (for example failed MOT) must be disposed of via an approved vehicle dismantler. Contact the ASQEP-W for advice.

4.4 **Hazardous Waste**

4.4.1 The site shall be registered with Natural Resources Wales (NRW) as a hazardous waste producer and the registration number used on the appropriate documentation.

ACTION: Head of Waste

4.4.2 Any hazardous waste should be identified at the work planning stage and a handling, storage, and disposal option agreed before work commences.

ACTION: Project Manager / Head of Waste

- 4.4.3 Ensure that incompatible or hazardous wastes once segregated are stored in accordance with Health and Safety Executive (HSE) guidance HSG71 - The storage of packaged dangerous substances (Ref. 6.16).

ACTION: Project Manager / Head of Waste

- 4.4.4 Guidance on the classification and identification of hazardous waste can be found in Technical Guidance WM3 – Waste Classification Technical Guidance (Ref. 6.17). Onsite guidance via an ASQEP-W.

ACTION: ASQEP-W

- 4.4.5 A hazardous waste storage facility is located in the waste compound. The Waste Generator is responsible for transferring waste to the compound. Waste shall be accompanied with a Safety Data Sheet and any other information required for the safe storage and compliant disposal of the waste including the clearance certificate required by LSI-14-3-045. If the nominated store is not appropriate or convenient, another suitable secure temporary storage area must be agreed with the ASQEP-W. This store must be suitably secured and labelled.

ACTION: All staff

Waste being logged into the compound shall be recorded on TRAWS-F-1652, be up to date, and readily available for review. A summary is to be posted in each hazardous waste container.

ACTION: Waste Supervisor

- 4.4.6 Hazardous waste wood from demolition sites and business premises, must be identified, segregated, and consigned under List of Waste code 17-02-04*. All waste wood transferred to the compound shall be assessed against the guidance produced by the Wood Recyclers' Association (Ref. 6.18). For each waste wood skip, whether hazardous or non-hazardous, Wood Waste WM3 Assessment Confirmation TRAWS-F1650, shall be completed and kept with the skip consignment pack. For projects the Waste Engineer is responsible for providing guidance to the project, via the PWMP, and ensuring contractors have adequate arrangements in place to characterise, segregate, and compliantly dispose of hazardous waste wood.

ACTION: Waste Supervisor / Waste Engineer

4.5 Office and Mess Room Waste

- 4.5.1 Office, canteen and mess-room waste will be collected by Facilities Management and transferred to disposal bins located at suitable locations across site. The bins are locked off to prevent inadvertent access by a non-nominated contractor and the disposal of inappropriate waste bags.

ACTION: Facilities Management Contractor

Where practicable facilities will have bins to allow segregation of the following materials;

- Food
- Paper and card
- Glass
- Metals, plastic and cartons
- General waste

Some areas may not have all the bins available and it is all staffs responsibility to find the nearest bin and suitably segregate their waste.

ACTION: All staff

- 4.5.2 The Facilities Management contractor is responsible for managing waste bins used for collecting office and mess room waste including ensuring they are locked when not in use.

ACTION: Facilities Management

- 4.5.3 General and recyclable waste placed in wheeled bins outside the Radiological Controlled Area (RCA) undergo reassurance radiological monitoring. The wheeled bins are locked and are only accessed and loaded by the nominated facilities management contractor, who is accompanied by a RMP. Reassurance external monitoring of all Wheeled bins is undertaken on a weekly basis by a RMP.

Note: *Additional re-assurance monitoring is provided when the collection vehicle exits the Site via the Gate Post Monitor. See TRAWS-LSI-14-3-045.*

ACTION: Head of Waste

4.6 **Inert Waste**

- 4.6.1 Contact the Environment team and refer to G-016 to ascertain whether proposed treatment, storage, disposition or use of waste requires a permit or an exemption to operate. Opportunities to use wastes on site should be maximised.

ACTION: Head of Waste

- 4.6.2 Large volumes of inert waste is to be processed as outlined in S-100 prior to acceptance for re-use. Retention of the waste on site for re-use or for re-purposing as material under a respective quality protocol shall only be approved prior to generation and in agreement with an ASQEP-W and ESQEP.

A visual check in conjunction with the ASQEP-W shall be carried out on the waste and if there is any reason to suspect the waste may be contaminated with radioactivity, oil, chemicals or asbestos then suitable analysis of samples of the material will be required at an accredited laboratory to determine the suitability of the waste for re-use.

ACTION: ASQEP-W

- 4.6.3 Any treatment and further storage of inert material is to be done in conjunction with TRAWS-WMDDI-016-3203 Guidance for the Re-use of Material on Site (Ref. 6.19) or the under the regulatory options outlined in G-016 and the applicable measures required to comply with the selected option.

ACTION: Project Manager / Head of Waste

- 4.6.4 The Silt buster unit is used to filter solids slurry wash off from concrete delivery vehicles and to adjust the pH of the resulting filtrate.

No concrete slump is to be deposited in the unit. Concrete slump should be processed via the Waste Compound with the agreement of the Environmental Coordinator.

No Concrete slurry wash off is to be disposed via the Silt buster unit without a completed form TRAWS-F1083 (198-HPR-134) **Radiological Clearance Certificate and Form TRAWS-F1510 “Certificate for the disposal of concrete slurry wash off only from concrete delivery vehicles”** which are both to be supplied to the Environmental Coordinator prior to disposal.

ACTION: Environmental Coordinator

4.7 **Principal Contractor (PC) Project Waste**

4.7.1 All project waste shall be subject to 100% checks until NRS waste are content with the waste segregation and management arrangements. The oversight arrangements may be relaxed to routine skip checks as considered appropriate and final transfer note sign-off by ASQEP-W or appointed Waste Supervisor. All waste shall be managed in accordance with the PWMP.

ACTION: PC / Project Manager / ASQEP-W

4.8 **Waste Container Management**

4.8.1 All skip / container movements on and off site shall be coordinated via ASQEP-W and the process outlined in Appendix C followed.

ACTION: Project Manager / Site Engineer / Head of Waste

4.8.2 A live register of all skips on-site shall be maintained using F-835. Conditional formatting shall be used to ensure advice warning is given when approaching the 12 month storage limit.

ACTION: Head of Waste

4.8.2 The following actions shall be implemented for containers stored external to the waste compound not under control of the waste team:

- Container to undergo pre-use checks to ensure they are fit for purpose and do not contain remnant waste
- Container to be securely stored i.e. heras fencing, stored in a locked area, and / or locked, to prevent unauthorised waste being deposited
- Container labelled as per Appendix D with the following details
 - Skip ID / location
 - Origin of waste
 - Permitted contents
 - Owner / contact number
 - Date on-site
- Container contents are known and verified e.g. use of F-834
- Skip Responsible Person nominated for day to day management purposes
- Waste Supervisor responsible for oversight purposes

ACTION: Project Manager / Site Engineer

Where waste containers are not stored in a lockable area with waste operations controlling access, consideration shall be given to the fitting of devices preventing the unauthorised uplift of the container. Keys for the devices will be held by the waste team or allocated Waste Supervisor.

ACTION: Head of Waste

4.8.3 If a skip is found to have material already present then the skip is to be quarantined immediately and the ASQEP-W and ASQEP-M informed. The skip must be made secure to prevent any additional material being added.

ACTION: Project Manager / Waste Supervisor

4.8.4 A file with the same unique number as the skip shall be produced, which will hold all the documentation of waste placed in the skip, i.e. form F-837, F-834, TRAWS-F1083 (198-HPR-134) and any photographs of the waste. All documentation will be retained until the skip leaves the site.

ACTION: Project Manager / Waste Supervisor

- 4.8.5 Ensure that waste is placed in the skip/container as directed by the ASQEP-W. Ensure that 3-way communications are used during loading of the skip to confirm its contents are logged correctly on the skip container vehicle contents log, F-834. The F-834 must be fully complete recording the description of the waste, the origin of the waste, the radiological clearance reference, (keeping the relevant F1083 (198-HPR-134) document as evidence that the waste is out of scope) and the person loading the skip for each load transferred into the skip. Where appropriate photos of the waste should be taken.

ACTION: Project Manager / Site Engineer

- 4.8.6 The skip owner shall ensure a record of contents of containers is maintained. This shall be done using the F-834. The nominated Waste Supervisor is responsible for ensuring all requirements of the relevant PWMP are adhered to and the contents of each container is as described on the F-834. The Waste Supervisor is responsible for maintaining and storing the records while the container remains on-site.

ACTION: Project Manager / Head of Waste

- 4.8.7 When the skip is full the process in appendix C is to be followed.

ACTION: Project Manager / Head of Waste

4.9 **Disposal**

- 4.9.1 Audits of facilities are undertaken by the Duty of Care Officer as per S-385 Waste Management Facility Duty of Care Assessment Programme (Ref 6.20). A site based SQEP nominated assessor can also undertake assessments and these should be recorded on F-360 Waste Management Facility Duty of Care Assessment. Prior to arranging any disposals a check shall be made to ensure the disposal facility is approved and recorded on the F-836.

ACTION: Head of Waste

- 4.9.2 Check that the appropriate paperwork is in place, undertake independent 10% check of skip contents where practicable and sign onto the F-837. If satisfied that the paperwork is in place and correct and reflects the skip's contents, sign F-837 approving the disposal. If not satisfied with the contents of the skip then the skip does NOT leave the site and the non-conforming waste is removed and put into the correct skip.

ACTION: Waste Supervisor / ASQEP-W

- 4.9.3 The approved list of disposal sites and carriers information must be checked prior to dispatch.

ACTION: Waste Supervisor

- 4.9.3 Removal of Waste from the site requires the following to be in place (record in the skip/container file):

- a) TRAWS-F1083 (198-HPR-134) for the items that have been loaded into the container (where applicable);
- b) TRAWS-F1083 (198-HPR-134) for the skip/container as a whole;

Note: *Skips/containers leaving the RCA must do so on the same day clearance is given. If not, they must be re-monitored.*

Outside the RCA, the Clearance Certificate is valid for the skip to leave the site for 7 days from the date of its issue. See TRAWS-LSI-14-3-045. However no new waste is to be placed in the skip.

ACTION: Waste Owner / Waste Supervisor

- 4.9.4 For all non-hazardous waste leaving site, a Waste Transfer Note, shall be completed in accordance with S-100.

ACTION: Project Manager / Waste Supervisor

- 4.9.5 For all hazardous waste leaving site, a Hazardous Waste Consignment Note shall be completed in accordance with S-100.

ACTION: Project Manager / Waste Supervisor

- 4.9.6 All consignments of waste shall be weighed on the site weighbridge and the mass recorded on the Waste Transfer Note or Hazardous Waste Consignment Note.

ACTION: Project Manager / Waste Supervisor

4.10 **Compliance**
Reassurance Monitoring of Skips/Containers

- 4.10.1 The Head of Waste is responsible for ensuring that routine reassurance health physics monitoring of skips and accessible material is undertaken, whether these skips are in the Waste Compound or not.

ACTION: Head of Waste

- 4.10.2 Preventing waste from escaping from skips is an absolute requirement. Form HPI-9-75-5-501-H (Ref. 6.21) and HPI-9-75-5-500-H (Ref. 6.22) are used for weekly routine checking of waste deposited in skips/containers outside and inside the Waste Compound. The WTL shall supply the RMP with a list of all skips on-site i.e. F-835.

ACTION: SQEP Radiological Monitoring Person (RMP) / WTL

Documentation

- 4.10.3 An ASQEP-W will carry out monthly reassurance checks of Waste Transfer Notes produced by Waste Supervisors to ensure standards are maintained. This check will include checking the F-837. This will be managed through Passport MWO 41329566.

ACTION: ASQEP-W

- 4.10.4 Hazardous waste quarterly returns shall be inspected by the NRS waste team every quarter to ensure all hazardous waste consignments have been accounted for.

ACTION: Head of Waste

END OF PROCEDURE

5. Records

- F-834 Waste Container Contents Log
- F-835 Skip/Container/Vehicle/Record Sheet
- F-836 Register of Approved Non-radiological Waste Facilities
- F-837 Waste Container Delivery and Dispatch Check Sheet

- F-798 Duty of Care: Waste Transfer Note
- TRAWS-F915 inert material stockpile record sheet
- TRAWS-F1510 Certificate for the disposal of concrete slurry wash off only from concrete delivery vehicles
- F-360 Waste Management Facility Duty of Care Check List
- TRAWS-F1083 (198-HPR-134) Radiological Clearance Certificate
- F-296 Waste Supervisor Record
- F-470 Project Waste Management Plan
- F-1650 Wood Waste WM3 Assessment Confirmation
- F-1652 Hazardous Waste Schedule

6. References

Reference	Title
6.1 S-100	Management of Controlled Waste
6.2 PD-026	Management of Waste
6.3	Hazardous Waste (England and Wales) Regulations 2005
6.4	The List of Wastes (Wales) Regulations
6.5	The Environmental Protection Act 1990 (as amended)
6.6	2005 The Waste Electrical and Electronic Equipment Regulations,
6.7	Waste (England and Wales) Regulations 2011
6.8	Control of Asbestos Regulations 2012
6.9	The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009
6.10	Waste Separation Requirements (Wales) Regulations 2023
6.11	The Construction (Design and Management) Regulations 2015
6.12 EPR16	The Environmental Permitting (England & Wales) Regulations, 2016 (plus amendments)
6.13 LSI-14-3-045	Radiological Clearance of Material
6.14 S-125	Management of Redundant Assets
6.15 S-051	Assessment, Control and Radiological Clearance of Material and Waste
6.16 HSG71	Chemical Warehousing: The storage of packaged dangerous substances

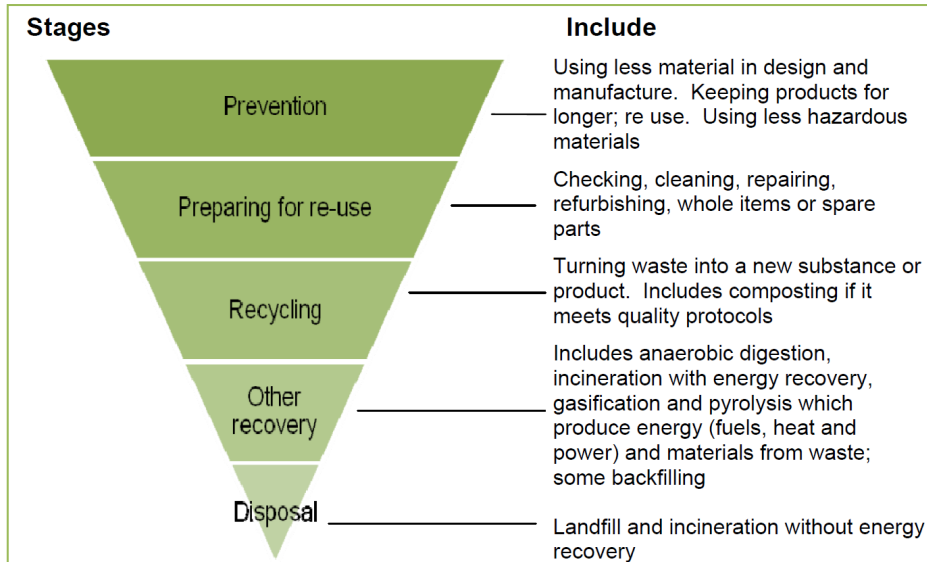
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6.17	WM3	Guidance on the Classification and Assessment of Waste
6.18		Waste Wood Assessment Guidance for the UK Waste Wood Industry
6.19	TRAWS-WMDDI-016-3203	Guidance for the Re-use of Material on Site
6.20	S-385	Waste Management Facility Duty of Care Assessment Programme
6.21	HPI-9-75-5-501-H	Skipped Waste Radiological Reassurance Checks
6.22	HPI-9-75-5-500-H	Skipped Waste Radiological Reassurance Checks Internal to RCA

7. Definitions

- 7.1 **Waste:** A key test in determining whether an object is waste or not is to ask: “Has the substance or object been discarded so that it is no longer part of the normal commercial chain or cycle of utility?”.
- 7.2 **Controlled Waste:** All non-radiological waste produced at Trawsfynydd is classed as “industrial Waste”. All non-radiological industrial waste is classed as **controlled waste**.
- 7.3 **Hazardous Waste:** Waste classed as hazardous under the Hazardous Waste Regulations 2005 (and subsequent amendments).
- 7.4 **Waste Supervisors:** - A person who has been assessed by the Head of Waste and the ASQEP-W and is competent in regard to waste management, particularly, those who will sign Transfer and Consignment Notes. This decision is recorded on form F-296 Waste Supervisor Record and retained by the Head of Waste.
- 7.5 **The Waste Hierarchy**
The Company must apply the Waste Hierarchy to ensure that re-use and recycling is maximised and disposal to landfill is minimised.

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Investigate the opportunities for re-use of all materials/wastes.

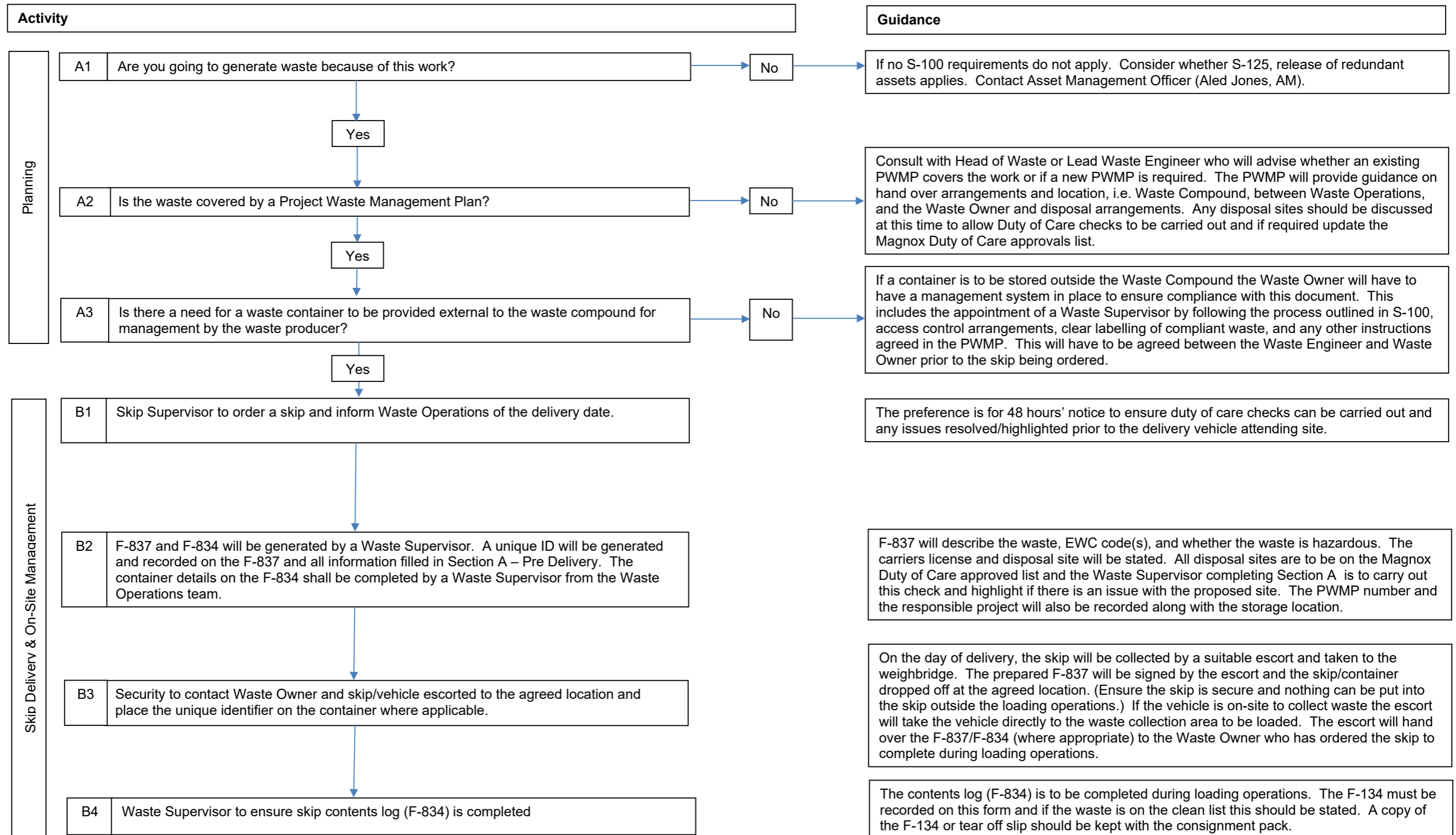
Segregate wastes wherever and whenever practicable to maximise recycling opportunities.

Provide facilities, such as recycling stations, with clear instructions and guidance to enable effective segregation of wastes.

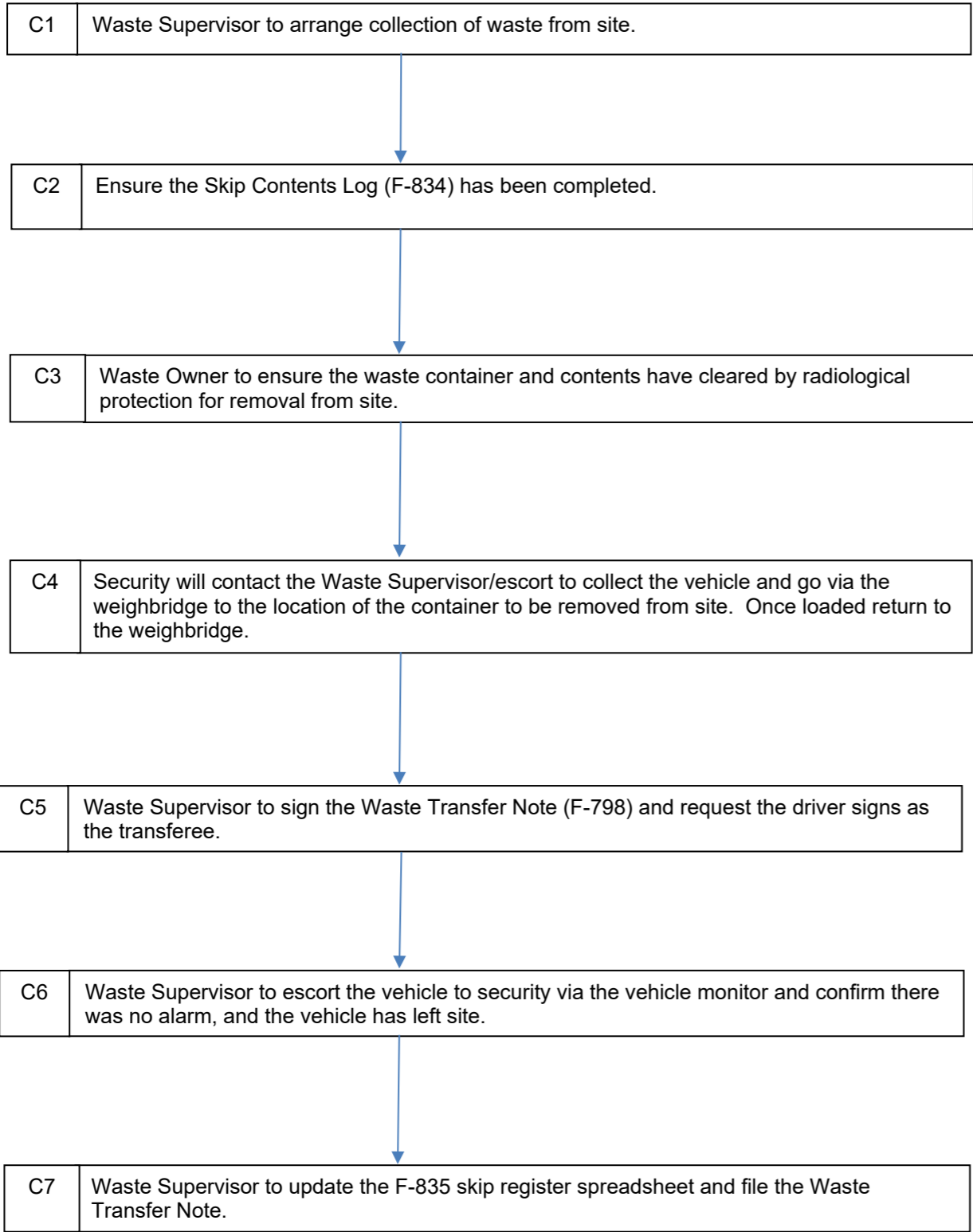
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Appendix A: Flow Diagram of Waste Process Controlled Waste Non-Hazardous

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Skip Collections and dispatch from site



Waste Operations to be notified of collection date and Waste Supervisor to complete Section C of F-837.

The Waste Owner is responsible for ensuring the Waste Supervisor has fully completed the F-834. The contents log has details of the loaded waste including reference to clearance certificates (F-134). If the F-834 is not fully complete and signed off the consignment could be delayed or postponed.

The waste owner is responsible for arranging clearance for the vehicle. The vehicle and load F-134 (if required) should be recorded in Section D of the F-837.

The preferred method is to use the installed weighbridge ticket machine to record the mass of the waste. The relevant details should be recorded on the ticket and the driver signs and is handed the top copy of the ticket. The mass is then added in kg to the waste transfer note. If the weighbridge ticket machine is not in service a manual calculation is required.

The final check on the Waste Transfer Note can be carried out and recorded in Section D of F-837. Only a Waste Supervisor with the authority to sign Waste Transfer Notes or an ASQEP-W can sign allowing the waste to leave site. The Waste Supervisor to confirm the F-837 is complete as far as practicable and the F-834 is fully complete.

Confirm there was no alarm on the vehicle monitor by completing Section D of the F-837.

A Magnox Waste Supervisor from within Waste Operations shall update the F-835 skip register to ensure the number of skips on-site is accurate and controlled waste reportable metrics are recorded and available. The consignment pack should be filed in the relevant folder in the Waste Operations office and retained for 2 years.

Appendix B: Hazardous Waste Variation to Flow Diagram

This appendix lists the variations in the flow diagram in appendix A for hazardous waste produced on -site.

Activity A2 and A3 will identify if hazardous waste is going to be generated. Packaging advice should be sought from a Dangerous Good Transport Officer to advise. The preferred route for hazardous waste is via the Waste Compound. Bulk asbestos containers will be managed by the licensed asbestos contractor.

Activity B2 – the waste will be recorded as hazardous in Section A of the F-837. A Dangerous Goods Transport Officer is to be contacted to advise whether the hazardous waste is dangerous for transport.

Activity C1 – if the waste is hazardous the consignment note is to be entered into Section C of F-837 and the consignment note should be prepared at this stage. If the contractor is preparing the consignment note on Magnox behalf a draft is to be requested to allow verification of the consignment note to be undertaken. Suitable time should be given for the verification, i.e. 48 hours, to prevent delays on consignment day.

Activity C5 – a Hazardous Waste Consignment Note is required in place of a Waste Transfer Note. Only an ASQEP-W is authorised to sign the F-837 confirming all the requirements for the dispatch of hazardous waste are met. If the hazardous waste is dangerous for transport, quality plan F-023 must be completed, and a Dangerous Goods Transport Officer sign the F-837 authorising the hazardous waste to leave site.

Activity C7- the retention period for Hazardous Waste Consignment Notes is 3 years and returns are to be received within 1 month of the period end. The date the return is received is to be recorded on the F-835.

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Appendix C: Process overview of Waste Container Movements On & Off Site

To bring a Waste Container (e.g. skip) onto Site		Action
a)	Contact ASEQP-W regarding requirements giving at least 48 hours-notice	Waste Owner
b)	A unique number will be generated for the container by the WC	WC
c)	F-837 and F-834 will be generated and relevant sections completed	WC
d)	On arrival security will contact a Site Engineer to arrange the escort of the waste transfer vehicle and container on to site. Site Engineer to inspect internals of container for non Traus generated waste and container condition	SE
e)	Site Engineer will contact the WC to inform arrival of skip on site	SE
e)	The escort the waste transfer vehicle and waste container, via the site weighbridge, to the agreed location and place the unique number on to the container	Escort
f)	The skip will be added to F-834 and F-835 and the skip label applied to highlight the EWC code for the permitted waste material.	WC
g)	After off-loading the waste container the waste transfer vehicle will be escorting from site	Escort
h)	The WC will record the container details and hand over F-834 to waste producer (where appropriate)	WC
Removal of a Waste Container (e.g. a skip) from Site		
a)	Ensure the waste container has been cleared by health Physics for removal from site as per and F-134 produced	Waste Owner
b)	Ensure F-834 has been completed in full	Waste Owner
c)	Contact the WC to make arrangements for the removal of the skip from site or if project waste notify the WC of the planned arrangements for the removal of the skip giving at least 48 hours notice	Waste owner
d)	Sufficient notice (at least 48 hours) should be given to the Dangerous Goods Transport Officer (DGTO) to allow for completion of the Transport Quality Plan (F-023). It may be necessary to produce a new hazardous waste consignment note or transport document if the paperwork by the contractor is inadequate.	DGTO
e)	The WS will check the carriers registration is in date and ensure that the disposal point licenses are held and in date prior to permitting the disposal	WS
f)	F-798 Duty of Care Waste Transfer Note must be completed	WS
g)	Security will inform the Waste Owner when the waste transfer vehicle arrives at site	Security
h)	The Waste Owner will arrange for escort of the waste transfer vehicle to the location of the container being removed from the site.	Waste owner
i)	Waste Owner will notify the WC of the arrival of the waste transfer vehicle	Waste owner

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j)	F-837 must be signed by either the ASQEP-W or WS and for Dangerous Goods a DGTO	DGTO ASQEP- W
k)	F-023 must be completed for all waste consignments of dangerous goods	DGTO
l)	The WS will remove the unique number label from the container prior to the waste transfer vehicle being escorted from site via the weighbridge	WS
m)	On departure offsite the completed F-134 tear-slip will be presented to gatehouse to allow exit. The remainder of the F-134 will be filed with health Physics	Escort
n)	WC will update the Waste Control records accordingly	WC



Waste Skip



Skip ID / Location	
Origin of Waste	
Permitted Contents / EWC	
Owner / Contact No	
Date On-Site	



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