



**BioConstruct NewEnergy Ltd**

**Flintshire AD Plant  
Weighbridge Road  
Flintshire  
CH5 2LL**

<b>DOCUMENT TITLE:</b>	<b>SITE WASTE MANAGEMENT PLAN</b>
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# Site Waste Management Plan (SWMP)

## 1. Document Control

<u>Item</u>	<u>Details</u>
Site	Flintshire AD Plant
Location	Weighbridge Road Flintshire, Deeside
Operator	BioConstruct NewEnergy Ltd
Environmental Permit	TBC
Facility Capacity	149,000 tonnes per annum
Plan Version	1.0
Issue Date	April 14 <sup>th</sup> 2026
Review Period	Annual or following operational change

## 2. Purpose and Scope

This Site Waste Management Plan (SWMP) establishes the procedures and controls implemented at the facility to ensure that all wastes arising from the operation of the Anaerobic Digestion (AD) plant are managed in a safe, environmentally responsible, and legally compliant manner.

The plan provides a structured framework for the identification, segregation, storage, handling, and transfer of wastes generated on site.

The primary purpose of this plan is to ensure that waste management activities are undertaken in accordance with the waste hierarchy, prioritising waste prevention, reuse, recycling, and recovery before disposal, and thereby minimising the environmental impact of the facility's operations.

The SWMP also supports compliance with the requirements of the Environmental Permit and applicable waste management legislation by establishing clear procedures to ensure that wastes are:

- Managed in accordance with the **waste hierarchy**, with appropriate consideration given to prevention, reuse, recycling, recovery, and disposal.
- Stored, handled and transported in a manner that prevents pollution of land, surface water, groundwater, and air.
- Segregated and contained appropriately to prevent cross-contamination between waste streams.

- Transferred only to authorised waste carriers and permitted waste management facilities.
- Accurately recorded and tracked in accordance with Duty of Care requirements, including the completion and retention of Waste Transfer Notes and Hazardous Waste Consignment Notes where applicable.
- Managed in a manner that minimises risks to human health, site personnel, contractors, and the surrounding environment.

This plan forms part of the site's wider Environmental Management System and supports the operational controls implemented to ensure ongoing compliance with environmental permit conditions and regulatory expectations.

### **Scope of the Plan**

This plan applies to all waste materials generated during the routine operation, maintenance, and management of the facility. The scope of the plan includes wastes arising from:

- Feedstock reception and pre-treatment operations, including depackaging, screening, and removal of non-biodegradable contaminants.
- Anaerobic digestion processes, including the generation, storage, and management of digestate and associated residues.
- Biogas utilisation systems, including Combined Heat and Power (CHP) units and biogas upgrading systems.
- Routine maintenance and engineering activities, including oils, filters, absorbents, scrap materials, and other maintenance-related wastes.
- Laboratory, process chemical, and operational consumables, including containers and packaging.
- Site welfare facilities, including office and staff amenity waste streams.

The plan applies to all personnel working on site, including employees, contractors, and visitors involved in operational activities that may generate or handle waste.

This document does not cover wastes generated by third-party contractors off site; however, contractors working on site must comply with the waste management procedures outlined in this plan.

The SWMP will be reviewed periodically and updated as required to reflect changes in operational practices, regulatory requirements, environmental permit conditions, or waste management arrangements.

## **3. Regulatory Framework**

Waste management on site complies with:

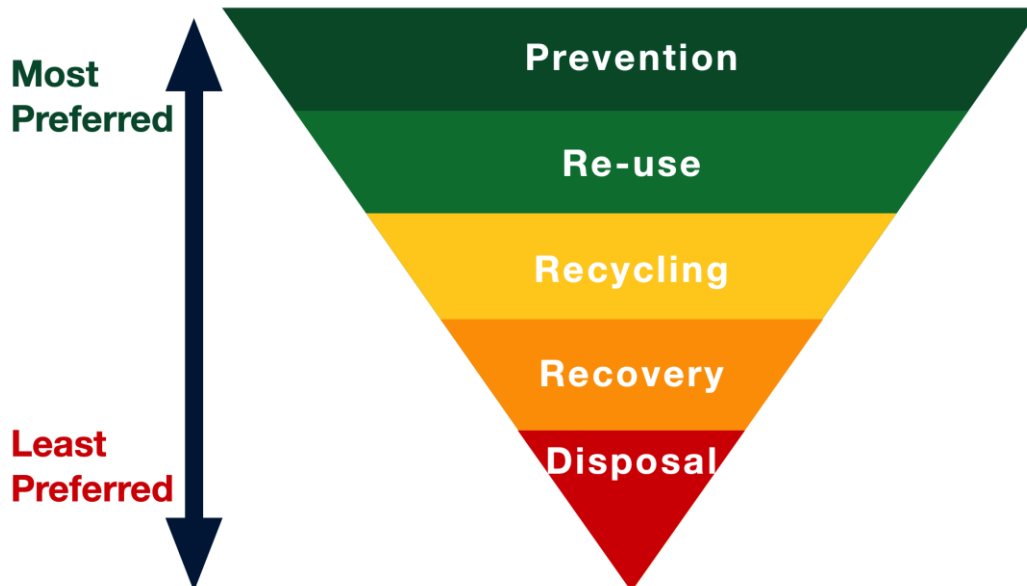
- Environmental Permitting (England and Wales) Regulations 2016
- Waste (England and Wales) Regulations 2011
- Environmental Permit conditions issued by Natural Resources Wales

- Duty of Care under Section 34 of the Environmental Protection Act 1990.

#### 4. Waste Hierarchy Application

The facility applies the waste hierarchy to minimise waste generation.

<u>Priority</u>	<u>Application on Site</u>
Prevention	Feedstock quality controls to reduce contamination
Reuse	Reuse of packaging and containers where feasible
Recycling	Segregation of recyclables such as metals
Recovery	Digestate used as fertiliser on agricultural land
Disposal	Residual waste sent to permitted disposal facilities



## 5. Waste Streams Generated on Site

The principal wastes generated during AD plant operations are summarised below.

Waste Type	EWC Code	Source	Management Method
PAS110 Digestate – Whole	19 06 06	AD digestion process	Agricultural recovery
Screening rejects / plastics	19 12 12	Feedstock pre-treatment	Off-site recovery or disposal
Waste oil	13 02 05	Engine and plant maintenance	Licensed hazardous waste contractor
Oil filters	16 01 07	Maintenance	Hazardous waste contractor
Contaminated absorbents	15 02 02	Spill response	Hazardous waste contractor
Scrap metal	17 04 05	Maintenance	Recycling
Chemical containers	15 01 10	Process chemicals	Hazardous waste contractor

## 6. Feedstock Contamination Management

Effective management of feedstock contamination is essential to ensure the efficient operation of the Anaerobic Digestion (AD) process, maintain digestate quality, and minimise the generation of waste residues requiring off-site disposal.

The facility implements a structured feedstock acceptance and inspection procedure to minimise the introduction of contaminants into the AD system and reduce the quantity of rejected material generated during pre-treatment.

All feedstocks delivered to site are subject to a pre-acceptance assessment and verification process to ensure that only materials suitable for anaerobic digestion are received.

These controls are designed to ensure compliance with the facility's Environmental Permit conditions and any applicable quality standards associated with digestate production.

### Pre-Acceptance Procedures

All incoming feedstocks must follow the site's documented Feedstock Acceptance Procedure (BCNE-PROC-18) prior to delivery to the facility.

The pre-acceptance process includes:

- Verification that the material type is permitted under the site Environmental Permit.
- Review of waste classification and relevant European Waste Catalogue (EWC) codes.
- Assessment of the supplier's waste description and origin.
- Confirmation that the material is suitable for anaerobic digestion and does not contain excessive levels of contamination.
- Establishment of supplier agreements or waste supply contracts outlining acceptance criteria.

Where necessary, additional supporting documentation may be required from suppliers, including waste composition information, sampling data, or confirmation of source segregation.

Only feedstocks that have successfully completed the pre-acceptance process are authorised for delivery to the site.

### **Load Inspection Procedures**

All loads arriving at the facility are subject to inspection to verify compliance with the site acceptance criteria.

The following checks are carried out:

- Weighbridge Inspection
- Delivery documentation is checked against the pre-accepted waste type.
- Waste carrier registration details are verified where applicable.
- Visual inspection of the load is undertaken where practicable.
- Any obvious signs of contamination or non-conforming material are recorded.

### **Tipping Floor / Reception Area Inspection**

- Loads are visually inspected during unloading.
- Operators assess the level of contamination within the material.
- Any unacceptable material identified at this stage may result in load rejection.

### **Load Rejection**

Loads may be rejected where:

- The material type does not match the approved waste description.
- Contamination levels exceed the site acceptance criteria.
- Hazardous materials or prohibited wastes are present.
- The waste presents a risk to plant equipment, personnel, or the environment.

Rejected loads are managed in accordance with the site's Waste Rejection Procedure, which may include:

- Removal of the load from site by the delivering contractor.
- Temporary segregation pending removal.
- Documentation of the rejection and notification to the supplier.

All rejected loads are recorded in the site waste tracking system.

## **Typical Contaminants**

Contaminants encountered within incoming feedstocks may include:

- Plastics and plastic packaging
- Composite food packaging materials
- Stones and rubble
- Metals and metal fragments
- Glass
- Non-biodegradable materials
- Excessive quantities of grit or inert material

The presence of these contaminants can adversely affect plant performance, increase wear on equipment, and reduce the quality of digestate.

## **Pre-Treatment and Contaminant Removal**

Where feedstocks contain minor levels of contamination within acceptable limits, contaminants are removed through the facility's pre-treatment systems, which may include:

- Depackaging equipment
- Screening systems
- Maceration and separation processes
- Magnetic separation for metals

These systems separate biodegradable organic material from non-digestible contaminants prior to the digestion process.

## **Management of Removed Contaminants**

Materials removed during pre-treatment are classified as screening rejects and are managed as waste in accordance with the site Waste Management Plan.

Where contamination is identified during processing:

1. Non-digestible materials are segregated during pre-treatment operations.
2. Reject materials are transferred to designated covered waste skips or containers located within the waste storage area.
3. Skips are stored on impermeable surfaces and managed to prevent litter escape or environmental pollution.
4. Waste is periodically removed from site by authorised and licensed waste contractors.
5. Waste transfer documentation is completed in accordance with Duty of Care requirements.

Where possible, the site seeks to ensure that reject materials are sent to recovery or recycling facilities rather than disposal.

## **Monitoring and Continuous Improvement**

Contamination levels in feedstocks are monitored routinely as part of operational performance management. Where repeated contamination issues are identified with particular suppliers or waste streams, the site may implement additional controls, including:

- Increased inspection frequency
- Supplier feedback and corrective actions

- Revised acceptance criteria
- Suspension of feedstock acceptance where necessary.

These measures support the continuous improvement of feedstock quality and help minimise the generation of waste residues from the AD process.

## 7. Reject and Screening Waste Management

Pre-treatment systems used at the facility, including depackaging equipment, screening systems, and contaminant separation processes, generate residual materials commonly referred to as **reject or screening waste**. These materials consist primarily of non-biodegradable contaminants removed from incoming feedstocks prior to the anaerobic digestion process.

Effective management of these rejects is essential to maintain plant performance, minimise environmental impacts, and ensure compliance with the site Environmental Permit and waste management legislation.

Reject materials typically include items such as plastic packaging, composite food packaging, metals, glass, stones, and other non-digestible materials that cannot be processed through the anaerobic digestion system.

### Handling Procedure

Reject materials generated during the pre-treatment process are managed through controlled handling procedures designed to prevent litter escape, odour generation, and environmental contamination.

Reject waste is typically:

- **Collected via conveyors or chutes** directly from depackaging or screening equipment.
- **Transferred into designated waste containers or skips**, typically located within the reception building or enclosed waste handling area.
- **Deposited into covered skips or sealed containers** to minimise odour and prevent litter escape.
- **Managed in accordance with the site waste segregation procedures** to ensure that reject materials are stored separately from other waste streams.

Operators responsible for pre-treatment activities monitor reject generation and ensure that waste containers are replaced or emptied when approaching capacity.

### Storage Controls

Reject waste storage areas are designed and managed to minimise the risk of environmental pollution and nuisance impacts.

Storage controls include:

- **Location on impermeable surfaces** to prevent contamination of ground or groundwater.
- **Connection to contained drainage systems** to ensure that any liquids or wash-down waters are captured and managed appropriately.

- **Use of covered skips or enclosed containers** where practicable to prevent rainwater ingress, odour release, and litter escape.
- **Clearly designated waste storage areas** within the facility to ensure proper segregation and safe handling.

Reject waste is stored only within approved waste storage locations as identified in the site waste management procedures.

### **Waste Removal**

Reject wastes are removed from the site at regular intervals to ensure that waste does not accumulate beyond the available storage capacity.

Waste removal arrangements include:

- Scheduled collections by authorised waste contractors.
- Monitoring of skip fill levels by site operators.
- Replacement of full containers with empty skips to maintain continuous waste handling operations.

Reject waste is transferred only to appropriately permitted waste management facilities in accordance with Duty of Care requirements.

### **Storage Location Control**

All reject and screening wastes generated at the facility are stored within the reception building or designated internal waste storage areas.

**No reject or screening waste will be stored outside of the reception building.**

This control measure helps to:

- Prevent windblown litter and fugitive emissions
- Minimise odour impacts
- Prevent rainwater ingress into waste materials
- Reduce the risk of environmental contamination
- Maintain good housekeeping standards across the facility.

### **Housekeeping and Monitoring**

Reject storage areas are included within the routine waste storage inspection programme.

Regular checks are undertaken to ensure that:

- Containers are not overfilled
- Waste remains contained within designated skips
- No litter or debris escapes from storage areas
- Waste is removed in a timely manner.

Any issues identified during inspections are addressed through the site corrective action process.

## 8. Digestate Management

Digestate is the primary by-product generated from the anaerobic digestion process and represents the stabilised organic material remaining following the biological breakdown of biodegradable feedstocks in the absence of oxygen. Effective management of digestate is essential to ensure compliance with environmental permit conditions, maintain product quality, and prevent environmental pollution.

The facility implements a structured digestate management system covering the **production, storage, handling, monitoring, and recovery** of digestate generated during plant operations.

### Digestate Types

Digestate produced by the anaerobic digestion process may be handled either as a whole digestate or separated into two fractions depending on the configuration of the facility.

The digestate fractions typically include:

- **Liquid digestate** – the liquid fraction containing soluble nutrients such as nitrogen, phosphorus, and potassium.
- **Fibre digestate** – the solid fraction generated following digestate separation processes.

Digestate separation may be undertaken using mechanical separation equipment such as screw presses, decanter centrifuges, or similar systems. Separation can improve nutrient management flexibility and optimise storage and land application arrangements.

### Digestate Storage

Digestate is transferred from the digestion process to designated storage infrastructure prior to removal from site or land application.

Storage systems may include:

- Sealed digestate storage tanks
- Covered storage lagoons (where permitted)
- Fibre storage clamps or solid storage areas
- Bunded storage areas designed to prevent the escape of liquids.

All digestate storage infrastructure is designed and maintained to minimise the risk of environmental pollution. Storage facilities are constructed using impermeable materials and are integrated with the site drainage management system.

Where tanks or lagoons are used, they are designed to:

- Prevent leakage or seepage to ground or groundwater
- Prevent overflow during periods of high production or rainfall
- Allow safe access for inspection and maintenance.

## **Storage Capacity**

The facility maintains adequate digestate storage capacity to ensure compliance with Environmental Permit requirements and to enable appropriate timing of digestate export or land application.

Storage capacity is managed to ensure:

- Sufficient contingency storage during periods when land spreading is not possible
- Flexibility to accommodate seasonal agricultural spreading restrictions
- Prevention of uncontrolled discharges or emergency spreading.

Storage levels are routinely monitored by site operators as part of operational management procedures.

## **Use and Recovery**

Digestate is recovered as a beneficial product and is typically used as an agricultural fertiliser or soil conditioner due to its nutrient content and organic matter value.

Digestate generated at the facility may be:

- Applied to agricultural land as a fertiliser or soil conditioner
- Exported to authorised agricultural users
- Used in accordance with approved nutrient management plans.

Land application is undertaken in a manner that protects soil quality, water resources, and the wider environment.

Application rates are typically determined based on:

- Crop nutrient requirements
- Soil nutrient levels
- Seasonal spreading restrictions
- Applicable agricultural regulations.

Digestate spreading is undertaken by suitably authorised operators using appropriate application techniques designed to minimise odour and nutrient losses.

## **Quality Assurance**

Digestate produced at the facility complies with the requirements of the **Digestate Quality Protocol and PAS110 standard** where applicable. Compliance with these standards ensures that digestate can be classified as a product rather than a waste when it meets specified quality criteria.

Quality assurance procedures may include:

- Routine sampling and analysis of digestate
- Monitoring of key parameters such as nutrient content, dry matter, and contaminants
- Documentation of digestate production and distribution.

These controls ensure that digestate remains suitable for agricultural use and meets the relevant regulatory and quality standards.

## Environmental Protection Measures

The facility implements operational controls to prevent pollution associated with digestate handling and storage. These measures include:

- Regular inspection of storage tanks, pipework, and lagoons
- Monitoring of storage levels to prevent overflow
- Maintenance of bunding and containment systems
- Immediate response procedures for any spillages or leaks.

Where digestate is transferred off site, the site ensures that transfers are undertaken in accordance with Duty of Care requirements and delivered only to authorised users.

## Record Keeping

Records relating to digestate production, storage, and export are maintained as part of the site Environmental Management System. These records may include:

- Digestate production volumes
- Storage capacity monitoring
- Sampling and laboratory analysis results
- Records of digestate exports and receiving land.

Maintaining accurate records supports regulatory compliance and provides traceability for digestate recovery activities.

## 9. Waste Storage Areas

Waste storage areas at the facility are designed and managed to ensure that all wastes are stored safely and in a manner that prevents pollution of land, groundwater, surface water, and air. Storage arrangements are implemented in accordance with the site Environmental Permit conditions and form part of the site's wider Environmental Management System. All waste storage areas are clearly designated, appropriately signed, and maintained to ensure that wastes are segregated and contained according to their classification and hazard type.

### Storage Infrastructure

Waste storage locations are constructed and maintained to provide appropriate environmental protection. Key infrastructure controls include:

- **Impermeable surfacing** to prevent infiltration of contaminants into the ground.
- **Sealed drainage systems** designed to capture any potential spillages or contaminated run-off.
- **Bunded storage areas** for hazardous liquids such as oils, chemicals, and other potentially polluting substances.
- **Covered waste skips or containers** where necessary to prevent rainwater ingress, litter escape, and odour generation.
- **Clearly labelled containers and storage areas** to ensure correct waste segregation.
- **Physical barriers or designated compounds** to prevent unauthorised access.

Where wastes are stored in containers or skips, these are maintained in good condition and inspected regularly to ensure structural integrity.

### **Waste Segregation**

Waste streams generated on site are segregated to prevent cross-contamination and to facilitate appropriate recycling, recovery, or disposal routes.

Typical waste segregation arrangements include:

- Screening rejects and packaging contaminants
- Scrap metal from maintenance activities
- Hazardous wastes such as oils, filters, and contaminated absorbents
- General site waste from welfare facilities
- Chemical containers and process consumables.

Separate containers or skips are provided for each waste stream where practicable.

### **Storage Capacity and Housekeeping**

Waste storage capacity is managed to ensure that waste does not accumulate beyond the available storage capacity and that waste removal occurs regularly.

Operational controls include:

- Routine removal schedules with authorised waste contractors
- Monitoring of skip fill levels
- Maintenance of good housekeeping standards within waste storage areas
- Immediate clean-up of spillages or waste deposits.

Waste storage areas are kept tidy and free from excess debris to minimise environmental risks and maintain safe working conditions.

### **Inspection and Maintenance**

Waste storage areas are subject to routine inspection as part of the site environmental monitoring programme. Inspections typically include:

- Verification that wastes are correctly segregated
- Confirmation that containers and skips are not damaged or overflowing
- Inspection of bund integrity and containment systems
- Checks for signs of leaks, spillages, or litter escape.

Any issues identified during inspections are recorded and addressed through the site corrective action process.

## **10. Waste Transfer Procedures**

All waste leaving the site is transferred in compliance with Duty of Care obligations.

### **Requirements**

The site ensures:

- Waste is transferred only to **registered waste carriers**
- Waste is sent only to **permitted treatment facilities**
- Waste Transfer Notes (WTN) are completed.

Hazardous waste transfers use **Hazardous Waste Consignment Notes**.

### **Record Retention**

Records are retained for:

- **2 years** for non-hazardous waste
- **3 years** for hazardous waste.

## **11. Waste Tracking Procedures**

### **Waste Tracking and Record Keeping Procedure**

The facility maintains comprehensive records relating to the generation, storage, transfer, and disposal of wastes in order to demonstrate compliance with Duty of Care obligations under the Environmental Protection Act and associated waste management legislation. All waste transfers from site are documented and tracked to ensure that waste is handled responsibly throughout its management chain.

### **Waste Transfer Documentation**

For each waste movement from the site, appropriate documentation is completed and retained.

This includes:

- **Waste Transfer Notes (WTNs)** for non-hazardous wastes.
- **Hazardous Waste Consignment Notes** for hazardous wastes.
- Records of waste carrier registrations.
- Records of receiving facility environmental permits.

These documents confirm:

- The description and classification of the waste
- The quantity of waste transferred
- The waste producer, carrier, and receiving facility details
- The date of transfer.

### **Authorised Waste Carriers and Facilities**

Prior to any waste transfer, the site verifies that:

- The waste carrier holds a valid **waste carrier registration**.
- The receiving facility holds a valid **environmental permit or exemption** allowing acceptance of the relevant waste type.

Copies of permits and registrations are maintained within the site waste contractor register.

### **Record Retention**

Waste documentation is retained for regulatory inspection in accordance with statutory requirements:

- **Waste Transfer Notes** are retained for a minimum of **two years**.
- **Hazardous Waste Consignment Notes** are retained for a minimum of **three years**.

Records are stored electronically or within controlled document management systems as part of the site Environmental Management System.

### Waste Data Monitoring

Waste transfer records are periodically reviewed to monitor:

- Quantities of waste generated
- Waste recovery and recycling performance
- Trends in contamination or reject levels.

This information supports the site's commitment to continual improvement and assists in identifying opportunities to reduce waste generation and improve operational efficiency.

### Auditing and Compliance

Waste management records may be subject to internal audits and external regulatory inspections. The site maintains an audit trail demonstrating that all wastes generated on site have been transferred to authorised carriers and managed at permitted facilities.

Any discrepancies or non-compliances identified during audits are investigated and addressed through the site corrective action procedures.

## 12. Waste Contractor Register

The facility maintains a Waste Contractor Register to ensure that all waste generated on site is transferred only to authorised waste carriers and permitted waste management facilities.

The register forms part of the site's Duty of Care compliance system and is reviewed periodically to confirm that all contractor licences and permits remain valid.

Prior to engaging any contractor for waste removal, the following checks are undertaken:

- Verification that the waste carrier holds a valid **waste carrier registration**.
- Confirmation that the receiving facility holds an appropriate **environmental permit or exemption**.
- Confirmation that the contractor is authorised to handle the specific waste stream.
- Review of relevant insurance and competence where applicable.

Copies of registrations, permits and supporting documentation are retained within the site Environmental Management System.

An example Waste Contractor Register is shown below.

Waste Stream	Contractor	Waste Carrier Licence	Receiving Facility	Facility Permit	Removal Frequency
Screening rejects	[Contractor Name]	[Licence Number]	[Facility Name]	[Permit Number]	As required
Scrap metal	[Contractor Name]	[Licence Number]	[Metal Recycling Facility]	[Permit Number]	As required

Waste oil	[Contractor Name]	[Licence Number]	[Hazardous Waste Facility]	[Permit Number]	Quarterly
Contaminated absorbents	[Contractor Name]	[Licence Number]	[Hazardous Waste Facility]	[Permit Number]	As required
General site waste	[Contractor Name]	[Licence Number]	[Municipal Waste Facility]	[Permit Number]	Weekly

The Waste Contractor Register is reviewed at least annually or whenever new waste contractors are appointed.

### 13. Waste Storage and Housekeeping Inspection Checklist

Routine inspections of waste storage areas are undertaken to ensure that wastes are being managed appropriately and that storage conditions do not pose a risk of pollution or environmental harm.

Inspections form part of the site's environmental monitoring programme and are typically undertaken on a **weekly basis** by trained operational personnel.

Inspection records are maintained within the site Environmental Management System.

#### Inspection Checklist

During inspections, the following aspects are assessed:

Inspection Item	Check Required	Status	Comments / Actions
Waste segregation	Correct waste streams placed in appropriate containers	<input type="checkbox"/>	
Container condition	Skips, drums and containers in good condition with no leaks	<input type="checkbox"/>	
Waste labelling	Containers clearly labelled with waste type	<input type="checkbox"/>	
Storage capacity	Containers not overfilled and sufficient capacity available	<input type="checkbox"/>	
Litter control	No loose waste or litter around storage areas	<input type="checkbox"/>	
Hazardous waste storage	Hazardous wastes stored within bunded areas	<input type="checkbox"/>	
Bund integrity	Bunds free from damage and with adequate capacity	<input type="checkbox"/>	
Drainage protection	No waste or contamination entering site drainage systems	<input type="checkbox"/>	
Spill kits	Spill kits available and adequately stocked	<input type="checkbox"/>	
General housekeeping	Waste storage area clean and well maintained	<input type="checkbox"/>	

Where any issues are identified during inspections, corrective actions are recorded and implemented promptly.

Examples of corrective actions may include:

- Removal or replacement of damaged containers
- Immediate clean-up of spillages
- Removal of accumulated waste
- Notification to site management for further investigation.

Inspection records provide evidence that waste storage areas are routinely monitored and maintained in accordance with the site Environmental Permit and environmental management procedures.

#### **14. Pollution Prevention Measures**

The facility implements a range of pollution prevention controls.

##### **Infrastructure Controls**

- Impermeable surfacing in waste handling areas
- Bunded chemical storage
- Drainage systems connected to containment
- Covered skips where appropriate.

##### **Operational Controls**

- Regular housekeeping inspections
- Waste storage capacity monitoring
- Immediate clean-up of spillages.

#### **15. Digestate Spill and Leak Management Procedure**

The facility implements a Digestate Spill and Leak Management Procedure to minimise the risk of environmental pollution arising from the storage, handling, or transfer of digestate.

Digestate contains nutrients and organic material which, if released uncontrolled, could potentially impact soil, groundwater, surface water, or drainage systems.

This procedure establishes the preventative controls, monitoring arrangements, and response actions required to manage digestate spills or leaks safely and effectively.

##### **Potential Spill Sources**

Potential sources of digestate release may include:

- Digestate storage tanks
- Storage lagoons or fibre clamps
- Transfer pipelines and pumping systems
- Tanker loading and unloading points
- Digestate separation equipment
- Valve failures or pipework damage
- Overfilling of storage infrastructure.

These areas are considered during routine inspection and risk assessments.

### **Preventative Measures**

A range of preventative measures are implemented to minimise the risk of digestate spills or leaks occurring.

These include:

- Construction of digestate storage infrastructure using impermeable materials.
- Installation of bunding and secondary containment around tanks and transfer areas where appropriate.
- Routine inspection and maintenance of pipework, pumps, valves, and storage tanks.
- Monitoring of digestate storage levels to prevent overfilling.
- Clearly defined tanker loading and unloading procedures.
- Training of operational personnel in digestate handling procedures.
- Implementation of good housekeeping practices around digestate handling areas.

These controls form part of the site's wider pollution prevention measures.

### **Routine Monitoring and Inspection**

Digestate storage systems and associated infrastructure are subject to routine inspections to identify potential issues before they result in environmental incidents.

Inspections typically include:

- Visual inspection of storage tanks and lagoons
- Inspection of pipework, valves, and pumps
- Checks for evidence of leaks, seepage, or structural damage
- Monitoring of tank levels and instrumentation
- Inspection of bunds and containment systems.

Inspection findings are recorded and any defects are addressed through the site maintenance management system.

### **Spill Response Procedure**

In the event of a digestate spill or leak, the following actions are undertaken:

#### **1. Stop the Source**

Where it is safe to do so, operators will immediately stop the source of the release. This may include:

- Shutting down pumps
- Closing isolation valves
- Stopping tanker loading operations.

#### **2. Contain the Spill**

Measures are implemented to prevent digestate from spreading beyond the immediate area. This may include:

- Spill kits are located throughout the facility.
- Use of spill kits and absorbent materials
- Temporary bunding using soil or sand
- Isolation of nearby drainage systems where possible.

### **3. Prevent Entry to Watercourses or Drains**

Priority is given to preventing digestate from entering:

- Surface water drains
- Watercourses
- Groundwater pathways.

Drain covers, absorbent booms, or physical barriers may be used where available.

### **4. Notify Site Management**

The incident is immediately reported to the Site Manager or responsible supervisor. The severity of the incident will be assessed and further response actions determined.

### **5. Clean-Up and Recovery**

Spilled digestate will be recovered where practicable using:

- Pumps or vacuum tankers
- Mechanical collection
- Absorbent materials.

Contaminated materials generated during the clean-up process are managed as waste and disposed of via authorised waste contractors where necessary.

### **6. Incident Reporting**

Significant environmental incidents will be reported to the appropriate regulatory authorities where required. Internal incident reporting procedures will also be followed.

The incident will be recorded in the site environmental incident log and investigated to identify the root cause.

### **Post-Incident Review**

Following any digestate spill or leak, the site will undertake a review to identify corrective and preventative actions.

This may include:

- Repair or replacement of damaged infrastructure
- Review of operational procedures
- Additional staff training
- Implementation of improved monitoring or inspection regimes.

The objective of this process is to prevent recurrence and continually improve the facility's environmental performance.

## **16. Training and Competence**

The facility recognises that effective waste management relies on appropriately trained and competent personnel. All staff involved in operational activities that may generate, handle, store, or transfer waste are required to receive appropriate training to ensure that waste management procedures are implemented correctly and that environmental risks are minimised.

Training forms part of the site's overall competence management framework and supports compliance with the requirements of the site Environmental Permit, environmental legislation, and internal environmental management procedures.

## Training Requirements

All operational staff receive training relevant to their roles and responsibilities. Core training topics include:

- **Waste segregation procedures** to ensure that different waste streams are correctly identified and placed in the appropriate containers or storage areas.
- **Environmental permit requirements**, including operational conditions relating to waste handling, storage, and transfer.
- **Pollution prevention measures**, including the correct management of waste storage areas and drainage protection.
- **Spill response procedures**, including the use of spill kits and emergency containment measures.
- **Duty of Care responsibilities**, including the legal requirements associated with waste storage, transfer, and documentation.
- **Identification and management of non-conforming waste** and contaminated feedstocks.
- **Safe handling of hazardous wastes** generated during maintenance activities.

Training also covers the environmental risks associated with the facility's operations and the potential impacts of poor waste management on soil, water, and air quality.

## Induction Training

All new employees and contractors working on site receive an environmental and operational induction prior to commencing work.

The induction typically includes:

- An overview of the site's Environmental Management System
- Waste management procedures and site rules
- Locations of waste storage areas and containers
- Spill response procedures and emergency contacts
- Environmental incident reporting requirements.

Contractors undertaking work on site are required to follow the same waste management procedures as site personnel.

## Refresher and Ongoing Training

Training is periodically refreshed to ensure that personnel remain aware of their responsibilities and any updates to procedures or regulatory requirements.

Refresher training may be provided:

- At scheduled intervals
- Following updates to operational procedures
- Following environmental incidents or near misses
- When new equipment or waste streams are introduced.

Additional training may be provided for personnel responsible for specific activities such as feedstock reception, waste documentation, or hazardous waste handling.

## **Competence Verification**

Competence is assessed through a combination of:

- Formal training sessions
- On-the-job supervision
- Operational experience
- Internal competency assessments where required.

Supervisors and site management are responsible for ensuring that personnel working within waste management areas are competent to perform their assigned tasks.

## **Training Records**

Training records are maintained within the site **Competence Management System (CMS)** as part of the Environmental Management System.

These records include:

- Details of training completed
- Dates of training delivery
- Names of personnel trained
- Refresher training schedules where applicable.

Maintaining accurate training records provides evidence that staff are appropriately trained and competent to carry out waste management activities in compliance with regulatory and permit requirements.

## **Continuous Improvement**

The training programme is periodically reviewed to ensure it remains effective and reflects changes in legislation, environmental permit conditions, and operational practices. Feedback from staff, audits, and incident investigations may be used to identify additional training needs and opportunities for improvement.

## **Waste Minimisation and Continuous Improvement**

The facility is committed to minimising the generation of waste and improving waste management performance through the application of the waste hierarchy and continuous improvement principles. Operational practices are designed to reduce waste generation at source wherever practicable and to maximise opportunities for reuse, recycling, and recovery.

Waste minimisation forms part of the site's wider Environmental Management System and supports the efficient operation of the Anaerobic Digestion process.

## **Waste Minimisation Measures**

A number of operational controls are implemented to reduce the quantity of waste generated on site. These include:

- **Feedstock quality management**, including supplier controls and pre-acceptance procedures to minimise contamination levels.
- **Effective pre-treatment systems** designed to separate contaminants efficiently while maximising recovery of biodegradable material.

- **Preventative maintenance programmes** to reduce equipment failures that could generate additional waste materials.
- **Segregation of recyclable materials**, such as scrap metals and packaging materials.
- **Efficient use of consumables and chemicals** to minimise unnecessary waste generation.
- **Monitoring of reject waste streams** to identify opportunities for improved feedstock quality or processing efficiency.

Where waste generation cannot be avoided, the site seeks to ensure that waste materials are directed to recovery or recycling routes wherever possible.

### **Performance Monitoring**

Waste generation and management practices are monitored as part of routine operational performance reviews. Monitoring activities may include:

- Tracking quantities of waste generated and removed from site
- Monitoring contamination levels in incoming feedstocks
- Reviewing waste contractor reports and disposal routes
- Identifying trends in reject waste generation.

This information is used to assess the effectiveness of existing waste management procedures and identify opportunities for improvement.

### **Continuous Improvement**

The facility seeks to continually improve waste management performance through:

- Regular internal environmental audits
- Review of operational procedures
- Staff feedback and engagement
- Investigation of environmental incidents or near misses
- Implementation of corrective and preventative actions.

These activities support the ongoing improvement of environmental performance and ensure that waste management practices remain aligned with regulatory expectations and best practice within the anaerobic digestion sector.

## **17. Plan Review and Document Control**

This Site Waste Management Plan is a controlled document within the site Environmental Management System and is subject to periodic review to ensure that it remains accurate, effective, and compliant with regulatory requirements.

### **Review Frequency**

The plan will be reviewed:

- **Annually** as part of the site Environmental Management System review.
- Following any **changes to the Environmental Permit**.
- Following **significant operational changes** that affect waste generation or management.

- After any **environmental incident** relating to waste handling or storage.
- When changes occur in relevant **waste management legislation or regulatory guidance**.

The purpose of these reviews is to ensure that the procedures described in this document continue to reflect the actual waste management practices implemented at the facility.

### Document Control

All revisions to this document are recorded within the document control register to ensure that only the most current version is in use. Superseded versions are archived for reference where required.

The document control register includes:

Version	Date	Description of Change	Author	Approved By
1.0	[Insert Date]	Issue of Site Waste Management Plan	[Author Name]	[Approver Name]

Updated versions of the plan are distributed to relevant personnel and stored within the site document management system.

Maintaining effective document control ensures that all staff and contractors have access to the latest approved procedures and supports compliance with regulatory and environmental management requirements.

## 18. Inspection and Monitoring

Regular inspection and monitoring of waste management activities are undertaken to ensure that wastes generated at the facility are stored, handled, and transferred in a manner that prevents environmental pollution and maintains compliance with the site Environmental Permit and applicable waste management legislation.

Routine inspections help to identify potential issues at an early stage, allowing corrective actions to be implemented promptly and reducing the risk of environmental incidents. The inspection programme forms part of the site's Environmental Management System and contributes to the ongoing monitoring of environmental performance.

### Inspection Programme

Waste management areas and associated infrastructure are inspected at defined intervals by trained operational personnel. The purpose of these inspections is to verify that waste storage arrangements remain compliant with site procedures and that appropriate pollution prevention measures are in place.

Typical inspections include the following:

<b>Inspection Item</b>	<b>Frequency</b>
Waste storage areas	Weekly
Bund integrity and containment systems	Monthly
Waste transfer documentation	At each waste transfer
Waste contractor compliance	Annual review

Additional inspections may be carried out where operational changes occur or where issues have previously been identified.

### **Waste Storage Area Inspections**

Weekly inspections of waste storage areas ensure that:

- Waste containers and skips are in good condition and free from leaks or damage.
- Waste streams are correctly segregated and labelled.
- Containers are not overfilled and sufficient storage capacity is available.
- Waste storage areas are clean, well maintained, and free from loose debris.
- There are no signs of spills, leaks, or litter escape.
- Hazardous wastes are stored within appropriate bunded containment areas.

Any issues identified during inspections are reported to site management and addressed through the corrective action process.

### **Bund and Containment Inspections**

Bunded areas used for the storage of liquids or hazardous materials are inspected monthly to ensure that containment systems remain effective.

Inspections typically include:

- Checking bund walls and base for cracks, damage, or deterioration.
- Ensuring that bunds remain free from accumulated debris or excessive rainwater.
- Confirming that containment capacity remains sufficient to capture potential spills.
- Verifying that valves, drains, and pipework within bunded areas are functioning correctly.

Any defects or maintenance requirements identified during inspections are recorded and addressed through the site maintenance management system.

### **Waste Transfer Documentation Checks**

Waste documentation is reviewed at the time of each waste transfer to ensure that all regulatory requirements are met. This includes verification that:

- Waste Transfer Notes are correctly completed.
- Hazardous Waste Consignment Notes are used where applicable.
- Waste descriptions and European Waste Catalogue (EWC) codes are accurate.
- Waste carrier registration details are valid.
- Receiving facilities hold appropriate environmental permits.

These checks ensure that the facility maintains full compliance with Duty of Care requirements.

### **Waste Contractor Compliance Review**

Waste contractors engaged by the facility are reviewed periodically to confirm that they remain authorised to transport and manage the relevant waste streams.

The annual contractor review typically includes:

- Verification of waste carrier registration status.
- Confirmation that receiving facilities hold valid environmental permits.
- Review of contractor performance and compliance history.
- Assessment of waste recovery or disposal routes.

Records of contractor checks are maintained within the site Waste Contractor Register.

### **Recording and Corrective Actions**

Inspection findings are documented using site inspection records or environmental monitoring checklists. Where issues or non-conformances are identified, corrective actions are implemented to address the problem and prevent recurrence.

Corrective actions may include:

- Removal of accumulated waste
- Repair or replacement of damaged containers or infrastructure
- Additional staff training
- Revision of operational procedures where necessary.

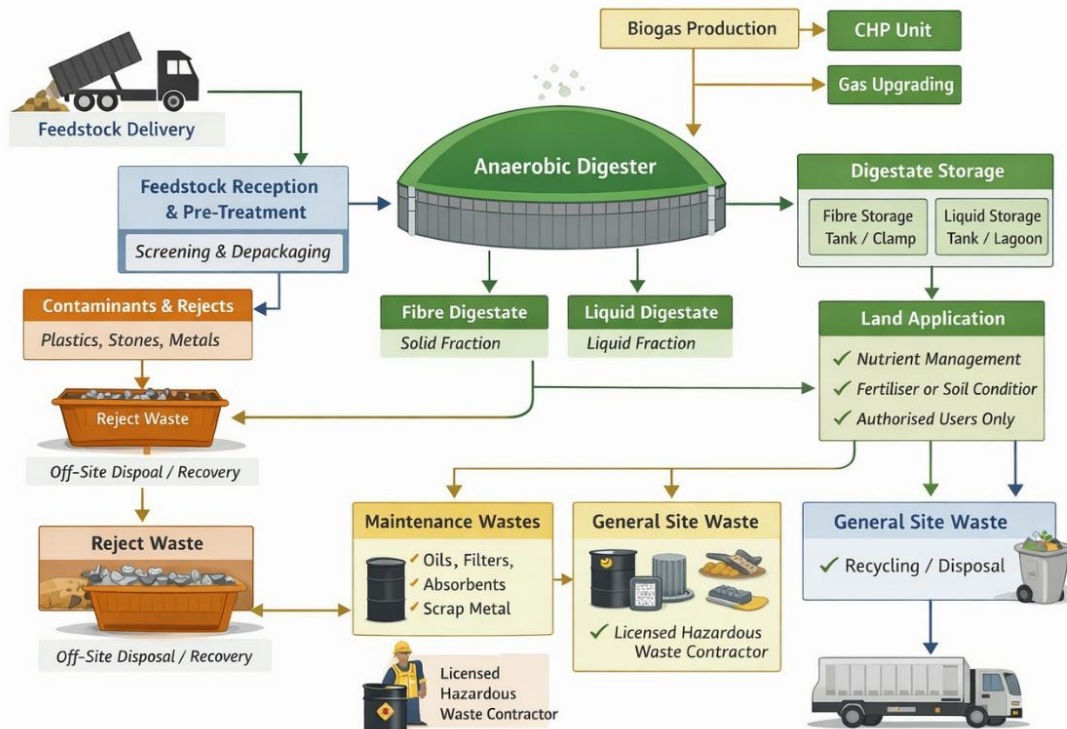
Maintaining accurate inspection records provides evidence that waste management activities are actively monitored and managed in accordance with the site Environmental Permit and environmental management procedures.

### **Appendices**

- Appendix 1 Waste Process Flow
- Appendix 2 BCNE-PROC-18 Feedstock Acceptance Procedure
- Appendix 3 BCNE-PROC-17 Feedstock Rejection Procedure

## Appendix 1

### Anaerobic Digestion Plant Waste Flow



### Waste Flow Summary

The material flow through the facility can be summarised as follows:

- Feedstock Delivery
- Feedstock Reception and Inspection
- Pre-Treatment and Contaminant Removal
- Anaerobic Digestion Process
- Biogas Production and Energy Recovery
- Digestate Storage and Recovery
- Removal of Residual Waste Streams.

This process ensures that the majority of incoming organic material is recovered as renewable energy and beneficial fertiliser products, while non-digestible materials are safely managed as waste in accordance with environmental regulatory requirements.

## Appendix 2

## Appendix 3