Very Low Level Waste Service Guidance

WSC-Guidance-V-001 – Issue 1 – May 2017

Document Control

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Executive Summary

The Low Level Waste Repository Ltd (LLWR) has implemented a framework contract which allows customers to dispose of Low Activity Low Level Waste (LA-LLW) and Very Low Level Waste (VLLW) to appropriately permitted landfill sites via the Waste Services Contract.

Access to the VLLW disposal service is via the standard LLWR Waste Enquiry process.

This document provides guidance to LLWR customers accessing the VLLW Service. It should be read in conjunction with the LLWR VLLW and LA-LLW disposal Waste Acceptance Criteria (WSC-WAC-VER) and the individual Service Providers' Waste Acceptance Criteria (WAC), copies of which can be obtained by contacting the Customer Team.

If you need any assistance or have any questions regarding the various WACs or LLWR’s Waste Services, please contact the LLWR Customer Team by telephone: (019467) 70300 or by e-mail: customerteam@llwsite.com
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1. Introduction

This document has been prepared by LLW Repository Ltd. Its purpose is to provide guidance to customers wishing to access the VLLW Disposal Service via the Waste Services Contract.

This is a guidance document only and does not represent the full range of acceptance criteria for each VLLW Service Provider; these requirements are defined in the provider’s service-specific WAC.

For a waste consignment to be accepted, it is necessary for the Customer to ensure that waste complies with the WAC of the relevant Service Provider. In addition, waste can only be accepted from customers in accordance with LL WR’s Waste Acceptance Procedure.

2. Background

The UK Strategy for the Management of Solid Low Level Radioactive Waste from the Nuclear Industry provides a high-level framework governing the management of LLW. The strategy has three guiding themes:

- Application of the Waste Hierarchy.
- The best use of existing LLW management assets.
- The need for new fit-for-purpose waste management routes.

Through the Waste Services Contract, LLWR provides consignors from across the UK with access to fit-for-purpose management, treatment and disposal routes. Access to these Services gives waste producers greater flexibility in managing LLW, offers the potential for greater cost efficiencies and results in less waste being disposed of at the LLWR site.

The VLLW Disposal Service Framework forms a key component in the implementation of the National Strategy.

3. Very Low Level Waste

The precise definition of VLLW as set out in the UK Government’s 2007 policy for the long term management of solid low level radioactive waste is reproduced in the glossary; however VLLW is normally regarded as material with a specific activity up to 200Bq/g, often referred to in the industry as Low Activity Low Level Waste (LA-LLW). The Policy also introduced a new category of waste, High Volume Very Low Level Waste (HV-VLLW), which covers material with a specific activity of less than 4Bq/g (or 40Bq/g for tritium contaminated wastes).

LLWR’s VLLW Disposal Service involves the use of appropriately permitted landfill facilities to dispose of LA-LLW and VLLW. For the purposes of this guidance, the term VLLW is also considered to include LA-LLW.

VLLW can consist of a wide variety of materials. Typical examples include:

- Concrete.
- Rubble.
- Excavated soils and contaminated ground from decommissioning and remediation work.
- Asbestos.
4. VLLW Service Suppliers

4.1 Overview

LLWR provides access to three landfill sites in the UK that are permitted to receive VLLW or HV-VLLW. Figure 1 shows the location of the facilities currently available through the LLWR framework.

LLWR continue to work with the supply chain to increase the capability of the current facilities and to add new landfills to the service as they become available.

- **FCC, Lillyhall (HV-VLLW)**
  FCC operates the Lillyhall landfill site near Workington in Cumbria. The site has been permitted since 2011 to receive HV-VLLW only, a sub-category of VLLW. Lillyhall is a non-hazardous landfill, although asbestos is acceptable where asbestos is the only hazardous substance present.

- **Suez, Clifton Marsh (VLLW)**
  Suez operates a landfill facility at Clifton Marsh, near Preston. The facility is permitted to accept solid LA-LNW and VLLW subject to relevant acceptance criteria. Although the landfill is classified as non-hazardous, Suez has developed, in consultation with the Environment Agency, Materials Acceptance Criteria (MAC) allowing radioactive waste containing hazardous substances within specified limits to be disposed of at Clifton Marsh.

- **Augean, East Northants Resource Management Facility (ENRMF) - (VLLW)**
  Located in East Northamptonshire, ENRMF is a permitted hazardous waste landfill facility. The site is permitted under the Environmental Permitting Regulations (EPR) regime to accept radioactive waste which meets the criteria specified in the Permit.

Figure 1: UK VLLW disposal facilities

4.2 Facility-specific Waste Acceptance Criteria

The following section provides general service requirements and an indication of the types of acceptable and restricted materials, however it does not represent the full WAC requirements. The service-specific requirements are fully detailed in each Service Provider’s WAC; copies can be obtained by contacting the LLWR Customer Team.
4.2.1 Augean - ENRMF

Augean’s ENRMF operates as a hazardous waste landfill and is permitted to accept hazardous waste as well as VLLW. The Permit specifies for radionuclides, or groups of radionuclides, disposal limits for deriving radiological capacity based on a sum of fractions-type approach.

Table 1 provides information on the general requirements for packages/consignments to the ENRMF.

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Limit</th>
<th>Further comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maximum gross package weight</td>
<td>2000kg</td>
<td>Maximum mass of the waste/package/pallet combination shall normally not exceed this limit.</td>
</tr>
<tr>
<td>Maximum specific activity</td>
<td>1000Bq/g</td>
<td>Maximum activity concentration within a 10 tonne consignment.</td>
</tr>
<tr>
<td>Average specific activity</td>
<td>200Bq/g</td>
<td>Average activity concentration when averaged over a consignment or every successive 10 tonnes must not exceed this value.</td>
</tr>
<tr>
<td>Dose rate @ 1m</td>
<td>10 µSv/h</td>
<td>Packages above this threshold can be accepted with prior notice to allow implementation of higher dose rate package control measures.</td>
</tr>
</tbody>
</table>

Augean cannot accept any of the following types of waste at the ENRMF facility:

- Waste containing free liquids.
- Waste which, in the conditions of landfill, is explosive, corrosive, oxidising, highly flammable or flammable, as defined in Annex III of Directive 91/689/EEC.
- Hospital and other clinical wastes arising from medical or veterinary establishments, which are infectious.
- Pressurised gas vessels.
- Chemical substances arising from research and development or learning activities, such as laboratory residues, which are not identified or which are new, and whose effects on man or on the environment are not known.
- Ion exchange materials (any material, whether synthetic or naturally occurring, that has the capability of interchanging ions from one substance to another by means of a reversible chemical or physical process).
- Complexing agents (either chelating agents or monodentate organic ligands).
- Waste which would otherwise present a danger to the facility operators during handling.
- Packages where the outer surface of the package is chemically contaminated.
4.2.2 Suez - Clifton Marsh

Wastes can be accepted for disposal if they are non-hazardous or if they are asbestos or construction materials containing asbestos. Wastes acceptable for disposal at Clifton Marsh are listed in schedule 2 of their Environmental Permit (EPR/BK2348IU).

Table 2 provides information on the general requirements for packages/consignments to Clifton Marsh.

<table>
<thead>
<tr>
<th>Suez – VLLW Service General Requirements</th>
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<tr>
<td>Parameter</td>
</tr>
<tr>
<td>------------</td>
</tr>
<tr>
<td>Maximum gross package weight</td>
</tr>
<tr>
<td>Maximum specific activity</td>
</tr>
<tr>
<td>Strontium-90</td>
</tr>
<tr>
<td>Average specific activity</td>
</tr>
<tr>
<td>Maximum dose rate at contact</td>
</tr>
<tr>
<td>Dose rate @ 1m</td>
</tr>
</tbody>
</table>

Suez is capable of handling a wide variety of package types for disposal into the Clifton Marsh landfill facility. Customers should consult with LLWR regarding package acceptability.

The following materials are not acceptable at the Clifton Marsh landfill site. If you have any of these materials you must consult the facility WAC, and speak with the LLWR Service Delivery Team.

- Waste containing free liquids.
- Waste which, in the conditions of landfill, is explosive, corrosive, oxidising, highly flammable or flammable, as defined in Annex III to Directive 91/689/EEC.
- Hospital and other clinical wastes arising from medical or veterinary establishments, which are infectious.
- Pressurised gas vessels.
• Chemical substances arising from research and development or learning activities, such as laboratory residues, which are not identified or which are new, and whose effects on man or on the environment are not known.
• Hazardous waste, unless meets WAC requirements, or agreed in advance.

4.2.3 FCC - Lillyhall

FCC’s landfill facility at Lillyhall is permitted to receive High Volume Very Low Level Waste (HV-VLLW) only, a sub-category of VLLW in which the allowed maximum activity concentration is 4 Bq/g (40 Bq/g for tritium contaminated wastes). Lillyhall is a non-hazardous landfill, although asbestos is acceptable where the only hazardous substance present is asbestos itself.

The Permit specifies for radionuclides or groups of radionuclides, disposal limits for deriving radiological capacity based on a sum of fractions approach.

Table 3 provides information on the general requirements for packages/consignments to Lillyhall.

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Limit</th>
<th>Further comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maximum gross package weight</td>
<td>2000kg</td>
<td>Maximum mass of the waste/package/pallet combination shall not exceed this limit.</td>
</tr>
<tr>
<td>Average specific activity</td>
<td>4Bq/g</td>
<td>The total activity concentrations must not exceed 4 Bq/g, except in the case of Tritium where the concentration must not exceed 40 Bq/g.</td>
</tr>
<tr>
<td>Maximum dose rate at contact</td>
<td>5μSv/h</td>
<td></td>
</tr>
<tr>
<td>Dose rate @ 1m</td>
<td>2.5μSv/h</td>
<td></td>
</tr>
</tbody>
</table>

FCC cannot accept any of the following waste types at the Lillyhall facility:

• Hazardous wastes (other than asbestos wastes where the only hazardous substance present is the asbestos itself).
• Whole or shredded tyres.
• Free liquids.
• Unknown chemicals.
• Pharmaceutically active materials.
• Complexing or chelating agents.
• Ion exchange materials.
• Wastes that are capable of generating toxic gases.
• Wastes capable of causing an explosive, corrosive, oxidative or flammability hazard.
4.3 Waste outside Normal Operating Parameters

After considering the relevant Service Provider WACs, if the waste does not appear to meet the criteria, please still contact LLWR as some flexibility does exist within the landfills’ WACs. In certain circumstances a variation to normal conditions for acceptance can be made if agreed by the Service Provider in writing with the Environment Agency.

5. VLLW Service Overview

5.1 Accessing the Service

To access the VLLW service the Customer will need to provide a scope of work using the Waste Enquiry Form (WEN). This form defines the Customer’s service requirement and should include sufficient information about the waste and requirements to enable Service Providers on the Framework to develop a realistic and achievable service proposal. The WEN should be supplemented with attachments, photographs and additional scope information capturing any other relevant details. The WEN form can be found at www.llwrsite.com/waste-services/waste-acceptance-procedure/.

Where waste streams are separate, hazardous waste, non-hazardous waste and asbestos should not be combined on the same WEN; this is because these waste types are managed differently at the receiving sites.

All sections of the WEN form must be completed in full. One of the tasks of the Customer Team is to assess whether the information provided is sufficiently comprehensive; if not, the form may be rejected. Experience has shown that where information on the waste has been partial or limited, Service Providers’ service offers have been caveated in order to de-risk against missing information. This results in a multitude of technical queries and has the potential to increase the cost and extend the schedule for the project.

A Waste Enquiry Form for VLLW will not be processed by LLWR unless the form includes:

- a detailed waste description
- reference to an approved WCH form
- a realistic estimate of quantities to be disposed
- the proposed packaging methodology
- radioactivity information
- EWC Codes (if classified as hazardous, provide analysis of haz content)
- a schedule for consignment
- confirmation that all pre-requisites are in place.

Both hazardous waste and activity information must be provided to allow LLWR to process a VLLW WEN, as the primary controls on acceptability at landfills take the form of numerical limits on quantities and types of radioactivity.

Before submitting the WEN, the Customer should review their waste against the framework Service Provider WACs to confirm if the waste is acceptable for consignment to one or more facility; any areas of concern or uncertainty should be highlighted on the WEN.

Customers should also use the WEN to indicate any service-specific requirements, which may include timescale constraints, packaging or transport restrictions, regulatory and security
Once completed, the Waste Enquiry form should be submitted to your Customer Team point of contact and customer.team@llwrsite.com.

Once received, LLWR will review the Waste Enquiry and discuss specific requirements with the Customer. A ‘further competition’ scope will be prepared and issued to all framework Service Providers for tender, as described in section 5.2. The “further competition” tender process offers each of our framework Service Providers the opportunity to bid on the work; this ensures the Customer gets the service they require at a competitive price. LLWR aims to complete the review and tender process in 30 working days; however, this period may be extended for more complex projects that are outside normal operating parameters of the facilities, or if new requirements for information emerge during the tender process. The Customer Team will discuss individual project timescales with the Customer and Service Providers. The end point of the WEN process will be the issue of a Waste Services Quotation (WSQ) to the Customer.

After accepting a WSQ, the next step is for the Customer to complete the Waste Consignment Information Form (WCI) for Diversion Services (reference: WSC-FOR-WCI_DIV). This form can be found at http://llwrsite.com/waste-services/waste-acceptance-procedure/. Further details of the consignment paperwork requirements are provided in section 6.

The fully completed WCI must be accompanied by an item register/manifest. The example item register tab in the WCI form can be used. If a Customer chooses to use their own manifest, the format must be agreed in advance with LLWR and must be on a per-package basis and, as a minimum, include:

- unique package ID
- contents description
- gross weight & volume
- net weight & volume
- hazardous substances (EWC code to be stated)
- contact dose rate
- full nuclide breakdown.

To be able to complete the WCI, the Customer must also have in place an approved Waste Loading Plan. When submitting the WCI, the Customer should indicate when they would like to consign the waste allowing at least 10 working days from the date of submission. LLWR will work with the Service Provider and Customer to agree a suitable consignment date.

The WCI Form and Manifest/Item Register must be submitted to consignments@llwrsite.com.

Following review of the WCI Form and manifest, and confirmation that the consignment is acceptable to the Service Provider, LLWR will issue a Waste Consignment Approval (WCA) to the Customer, confirming the supplier, and consignment date. The WSQ will provide a reference to the supplier WAC. It is the responsibility of the Customer to complete a final review of the waste against the Service Provider's WAC to ensure all conditions of the WAC are met.

Training is available on how to complete the WEN and WCI Form (Diversion Services); please see section 7 for details.

The flow diagram in Figure 2 shows an example process for accessing the VLLW Service.

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1 The term ‘further competition’ is explained in section 5.2
Very Low Level Waste Identified

Characterise Waste

Assign EWC code

Review against VLLW providers’ WACs

Confirm Pre-requisites

Prepare Waste Enquiry Form (WEN)

Submit WEN to LLWR

Prepare Waste Loading Plan

LLWR Tender Process

Issue Waste Services Quotation WSQ

Customer Accepts WSQ

Submit VLLW transport questionnaire

Complete and Submit WCI and Manifest

Waste Acceptance Process

Waste Consigned

Customer

LLWR

Figure 2: Example Service Flow Diagram
5.2 Award of work packages/Competition process

LLWR award packages of work for VLLW to framework Service Providers via a competitive tender process known as a “further competition”. Service Providers are invited to submit a tender for the services detailed in the Customer’s WEN and any supporting information provided. CTM, a web-based tender management tool is used to manage the procurement activities and communicate with Service Providers. Tenders are evaluated on the basis of their technical and commercial merit against specified tender assessment criteria. An agreed scoring methodology is used to award the work based on the Most Economically Advantageous Tender (MEAT). LLWR will issue a Waste Services Quotation to the Customer based on the service proposal provided in the preferred supplier’s Tender.

5.3 Transport and consignment of VLLW

As a consequence of the nuclear liability insurance regime, certain special conditions apply to the transport and consignment of VLLW; these Special Conditions are set out in full in the Waste Services Contract (reference WSC-CON-VSE). An example Waste Services Contract is available on the LLWR Website.

Notably, LLWR is required to be the named consignor of VLLW under “relevant carriage”. Under these arrangements LLWR takes charge of and title to the Waste Consignment. Transport from the Customer site to the disposal site must be arranged using LLWR transport services. LLWR must also carry out due diligence to ensure adequate arrangements are in place to consign the waste on a Customer’s behalf. The full requirements are given in VLLW / LA-LLW Transport Guidance Note PAA/GN06, which can be found by searching “PAA/GN06” at www.llwrsite.com. Customers must make sure that they have read and fully understood this guidance prior to making arrangements to consign VLLW.

5.4 Non-radiological classification

In addition to specifying the radiological content, an European Waste Catalogue (EWC) code should be determined for the waste based on Environment Agency guidance on the classification and assessment of waste: Technical Guidance WM3². This is necessary to assist in determining whether the material is hazardous or not. Figure 3, below, shows the approach that should be taken. Introductory training is available on classification and coding; see section 7 for details.

If waste is classified as hazardous, leach testing will normally be required to confirm that leach rates are within thresholds permitted at the landfill. However, there are examples of wastes which are hazardous but where leach testing is not required – such as asbestos. If a Customer wishes to dispose of hazardous waste without leach testing being undertaken, evidence should be provided showing why a leach test is not required.

² Whilst waste producers are not legally required under the European Waste Framework Directive to classify and code radioactive waste (unless it is exempt or out-of-scope of radioactive substances regulation), landfill sites operate under a non-radiological permitting system, which they apply to all waste they receive including VLLW.
Very Low Level Waste Identified

Assign EWC code

EWC code absolute non-hazardous?

Yes

EWC code absolute hazardous?

No

Leach test

Leach rate within thresholds?

No

Not acceptable for landfill

Yes

Acceptable for landfill

Seek further information*

No

EWC code mirror hazardous?

No

*If the EWC code chosen is either mirror hazardous or mirror non-hazardous, then further information will be required to support the code chosen. This can be either:

- By providing evidence on the components of the waste
- By providing a Material Safety Data Sheet (MSDS) for the waste
- By providing solid analysis on the waste such that this analysis can then be subject to the criteria in WM3

Figure 3: Non-radiological conditions for acceptance
6. Packaging and Transport

VLLW can be consigned in a range of suitable packages subject to prior agreement with the receiving facility through LLWR. Packages suitable for consigning VLLW include, but are not limited to, the following:

- Plastic, fibre, or steel drums up to 220 litres.
- PacTec bags.
- Builders bags up to 1m³.
- ISO freight containers (subject to agreement with the landfill).

In relation to unloading, landfills can generally accept standard packages that are up to 2.5 tonnes and that can be unloaded via on-site forklifts and telehandlers. Additional lifting capability can be brought in as required for larger or heavier items.

In order to determine the specific activity, the weight of the radioactive waste should be used (i.e. net weight) and not the weight inclusive of the packaging (gross weight).

Pallets and packaging used to consign waste will be deemed sacrificial and will also be buried in the landfill unless the Customer specifically requests for them to be returned.

Customers are responsible for ensuring that waste is packaged in accordance with the Certificate of Approval for the relevant package (where applicable) and the requirements of any associated Packing and Handling Instructions, or the manufacturer’s design. Customers are also responsible for labelling and consigning the waste in accordance with ADR and UK Road Transport Regulations.

In addition to labelling required by transport regulations, packages must be clearly identified with the same unique ID recorded on the item register or manifest. Any other supplier-specific labelling requirements must also be adhered to.

Details on how to book transport, hire FHISO containers, or purchase drums or containers can be found in the eLogistics Customer User Manual by following: www.llwrsite.com/waste-services/our-services/transport/.

LLWR can provide a variety of packages to customers; for more details, including Packing and Handling instructions for the various package types, please visit the packaging section of the LLWR website: www.llwrsite.com/waste-services/our-services/packaging/package-guides/.

Purchase of drums can be requested through the eLogistics system.

Standard Waste Loading plans for the consignment of a variety of package types can be found at www.llwrsite.com/waste-services/our-services/packaging/waste-loading-support-and-standard-waste-loading-plans-swlp/

7. Training

The National Waste Programme, in consultation with stakeholders, has developed a framework of training modules to support the growth of LLW management skills and knowledge. A list of the e-learning and classroom training modules currently available, free of charge, can be found on the LLWR website:
Training is available on how to complete the Waste Enquiry Form and the Waste Consignment Information Form (Diversion Services). There is also an introductory module available on Non-radioactive waste management, which includes classification and coding.

The development of training modules is ongoing, and LLWR welcome ideas or views on additional cross-industry training needs. If you have training content that could be adapted to share within the industry, or would like to be engaged in the development of future modules, please contact nwp@llwrsite.com.

8. Frequently Asked Questions

This section provides answers to frequently asked questions. If you cannot find an answer to your question below or you require further information please contact the LLWR Customer Team, or your Service Delivery point of contact via customerteam@llwrsite.com, telephone 019467 70300.

8.1 General Questions

Question 1: LLWR has provided a Waste Services Quotation offering a disposal service for my waste via Landfill X. We want the waste to go to Landfill Y. Can we change supplier? Unfortunately this is not possible. VLLW service providers are selected by means of a further competition process and packages of work are awarded based on framework award criteria in strict accordance with Public Procurement regulations. If a Customer is unwilling to send waste to the successful bidder because they prefer not to, they will not be able to send the waste via the LLWR framework. If specific constraints apply which restrict the choice of supplier then this should be communicated to LLWR in advance of the competition process.

Question 2: Landfill X is just down the road from our site. Why are you making me send my waste across the country? When assessing your waste to select the most appropriate disposal facility, LLWR takes into account a range of factors including transport cost, proximity and environmental detriment. Your waste may not be consigned to the landfill facility closest to your site, but it will be sent to the most appropriate facility taking into account these key considerations.

Question 3: I am uncertain about the quantity of waste to be disposed of and I am undecided regarding packaging. Can I still submit a waste enquiry? Unfortunately it is not possible to run a procurement exercise based on this level of uncertainty. A Waste Enquiry Form defines the scope of the work and needs to contain sufficient detail and associated confidence to allow Service Providers to develop a realistic and achievable service proposal. The tonnage/volumes stated in the WEN allow the Service Providers to take into account the size of the work pack when considering the level and structure of their service pricing. The greater the amount of helpful information, detail and confidence in a WEN; the greater the likelihood of a resulting service offering that is competitive and meets the Customer’s requirements with fewer caveats.
8.2 Waste Questions

**Question 1:** My waste appears not to meet the VLLW Service Providers’ WACs. Does this mean I definitely cannot consign this VLLW via the LLWR framework? You should still contact LLWR as some flexibility does exist within the landfills’ WACs. In certain circumstances a variation to normal conditions for acceptance can be made if agreed in writing with the Environment Agency.

8.3 Pricing Questions

**Question 1:** What does the VLLW service cost? And can I submit a Waste Enquiry to obtain a budget cost estimate? A further competition process is run for every package of work for VLLW, therefore the charging structure is specific to each project. Charges apply per MBq for different groups of radionuclides as well as volume, mass and handling charges. Rates will differ for each supplier and may go up, or down, depending on the characteristics of the waste and the size of the order. If you require a budget cost estimate only, indicative cost norms are available on the LLWR website.

In addition to the disposal charge, waste disposal is subject to landfill tax charged at the rate applicable at the time.

**Question 2:** Can you share with me the rates from previous projects? Unfortunately, for reasons of commercial confidentiality, the tenders and figures submitted by Service Providers cannot be shared outside of LLWR. The rates applied by the preferred supplier will be provided to the Customer on the Waste Services Quotation.
9. Glossary

*High Volume Very Low Level Waste (HV-VLLW)* is defined as radioactive waste with maximum concentrations of 4 megabequerels per tonne (MBq/te) of total activity which can be disposed of to specified landfill sites. For waste containing tritium the concentration limit for tritium is 40 MBq/te.

*Very Low Level Waste* is a sub-division of the LLW category, defined as:
(a) in the case of low volumes (‘dustbin loads’) of VLLW “Radioactive waste which can be safely disposed of to an unspecified destination with municipal, commercial or industrial waste (“dustbin” disposal), each 0.1m$^3$ of waste containing less than 400 kilobecquerels (kBq) of total activity or single items containing less than 40 kBq of total activity.

For wastes containing carbon-14 or hydrogen-3 (tritium):  
(i) in each 0.1m$^3$, the activity limit is 4,000 kBq for carbon-14 and Hydrogen-3 (tritium) taken together  
(ii) for any single item, the activity limit is 400 kBq for carbon-14 and Hydrogen-3 (tritium) taken together

Controls on disposal of this material, after removal from the premises where the wastes arose, are not necessary.

(b) in the case of high volumes of VLLW, “Radioactive waste with maximum concentrations of four megabequerels per tonne (MBq/te) of total activity which can be disposed of to specified landfill sites. For waste containing Hydrogen-3 (tritium), the concentration limit for tritium is 40MBq/te. Controls on disposal of this material, after removal from the premises where the wastes arose, will be necessary in a manner specified by the environmental regulators”.
