

Audit Report Form

Part One – Audit Reference Information

Permit Number	EAWML 50066/M01	Site Name	Nick Brookes
Date(s) of audit	18th June 2009	CAR ID No.	I/18.06.09/50066/M01
Lead Auditor	Rachel Argyros	Other Auditors	Alexis Massey, Greer Robson

Part Two – Scope of Audit

The objective of the audit was to assess compliance against specific conditions of the waste environmental permit ref. EAWML/50066 and to review the actions and recommendations identified during the major audit undertaken on the 29th January 2008.

The follow up audit focused on the following permit conditions:

1.3 Amendments to working plan and supporting information

2.1.1 Site engineering for pollution prevention and control – Site drainage and maintenance

Table 4.4 Standards for waste acceptance and control procedures – Identification of wastes

7.3 Site diary

7.4 Periodic reporting of environmental performance

In addition to the above, the Aggregate Washing Plant was inspected and operations were reviewed against the WRAP Aggregates Protocol.

The permit was assessed against relevant legislation including the following:

Environmental Protection Act 1990 (section 34),
The Environmental Permitting Regulations 2007,

Title	Audit report form for Nick Brookes				
No.	EAWML/50066	Status:	Version 1	Issue Date:	23July 2009
					Page 1 of 15

Part Three – Permit conditions

The table below summarises what permit conditions were audited, areas of non-compliance and suggested corrective action.

Permit condition	CAR sub-riteria	Comments and suggested corrective action	Proposed date for completion	CCS score 4 – 1	Environment Agency proposed response
Table 4.4 c)	C4	Areas and bays should be clearly defined and labelled to identify the waste stored within them	immediate	C4	Site warning
2.1.1 Table 2.1 b	B1	Concrete surface is cracked in places and needs to be repaired.	immediate	C4	Site warning
7.4.1	G4	Annual Environmental Report outstanding for March 2008 and March 2009. Operator required to submit reports by 1 st September 2009	1 st Sept 2009	C4	Site warning
1.3	A1	Various sections of the Working Plan were identified as requiring amendments by 1 st May 2008. Revised working plan is now outstanding. Section to include the new aggregate washing plant.	1 st Oct 2009	C4	Site warning
7.3.1	G2	Site Diary – records now held on site documenting TCP attendance, daily inspections and monitoring requirements	observation		

Part Four - Observations

Environment Officers Rachel Argyros, Alexis Massey and Greer Robson arrived on site at 10.00am on Thursday 18th June 2009. The auditors met with Nick Brookes, the Technically Competent Person for the site and [REDACTED], Operations Manager.

The first part of the audit involved an inspection of the site to observe waste management activities as they occurred. Nick Brookes accompanied the auditors during the site inspection.

The second part of the audit looked at the actions and recommendations raised during the major audit undertaken the previous year. The requirements of the WRAP Aggregates Protocol were also discussed. [REDACTED] assisted with this part of the audit.

The audit took place on a dry day. There was limited vehicle movements on site and the levels of waste were below the permitted levels. There were no dust emissions observed from the site activities at the time of the inspection.

Observations and non-compliances are detailed in the inspection report, summary of audit findings and in Part 5.

Summary of specific licence conditions

1.3 Amendments to the Working Plan and supporting information

The audit undertaken on the 29th January 2008 focused on working plan version 5.1 issued on the 28th April 2006. Sections of the working plan required amending and the operator was recommended to submit a revised working plan by 1st May 2008. To date this action remains outstanding.

Operator to submit the following information by 1st October 2009 :

- 1) A revised site plan C1134/02/D detailing all operations
- 2) Section 1.5.5 is no longer in the working plan and needs to be changed back to the original document of 2000
- 3) Section 1.5.4 is not mentioned in the version 5.1 working plan – this needs to be changed back to detail throughput quantities
- 4) Section 2.9 requested to be incorporated back into sections 2.7/2.8
- 5) Site security - Section 2.3 has no reference to where site inspections carried out and recorded – please amend
- 6) Section 2.5.1 does not give sufficient detail for the measurement of waste. Please update the working plan to reflect that it is fully computerised and any recording procedures that are now in place.
- 7) Details of the new aggregate washing plant to be provided - infrastructure, operation, maintenance procedures
- 8) Section 4.5 requires details of olfactory monitoring of aerial emissions and refers to Appendix VII. Version 5.1 does not have an Appendix V11
- 9) Licence condition 7.1.1 refers to section 3.4 of the working plan for the location of records. Section 3.4 details the waste transfer operations and there is no reference to the records. Please amend to describe the current location of records held on site as requested during last year's audit.
- 10) Section 1.10 Exempt activities requires updating to reflect current operations.
- 11) Copies of all Appendices to be provided.

The Working plan should be used as the site's Environmental Management System

(EMS). It should contain relevant information on how to manage the site's activities to ensure that there is no adverse impact on the environment.

Please refer to the attached document 'Managing your business operations well reduces the risks of harming the environment'

The information gives a guide on what should be included in an EMS and will assist with updating the working plan.

Title	Audit report form for Nick Brookes			
No.	EAWML/50066	Status:	Version 1	Issue Date: 23 July 2009
				Page 4 of 15

Condition 2.1.1 Table 2.1 b) Site Containment and drainage standards

Areas of cracks were observed on the site's concrete surface. The faults need to be repaired to prevent site drainage from entering and contaminating the ground below (Photographs 1,2 & 3).

Previous inspections have identified issues regarding poor drainage and standing surface water. Operator to ensure site drains are maintained to allow adequate drainage and prevent areas of standing water.

Photographs 1 Damaged concrete surface



Photograph 2 – Damaged concrete surface



Photograph 3 – Cracked concrete surface. Sprinklers had been operational prior to the inspection as indicated by the wet surface. No mud was noted at the time of the audit to be tracking off site and no dust emissions observed.



Condition 4.4 Table 4.4 c) Standards for waste acceptance and control procedures

The waste storage bays are not labelled. All bays require labelling to describe the type of waste material stored within them.

Photograph 4 – Waste inside transfer building waiting to be sorted on the trommel and in the picking station. Operator confirmed that maintenance works were undertaken on the machine during the previous week and that the level of waste had built up, although not exceeding the permitted the storage height.



Photograph 5 – Stock pile of wood chip. Height of waste material just level with the site boundary netting. Designated storage bay not labelled.



Photograph 6 – site yard in good order at time of inspection



Title	Audit report form for Nick Brookes				Issue Date:	23 July 2009	Page 8 of 15
No.	EAWML/50066	Status:	Version 1				

Condition 7.3 Site Diary

Weekly and daily inspections are being documented under the Record Form NB/RF/4. The form is also used to note any maintenance issues. Form RF18-TCP attendance records are being used to log the time the TCP has spent on the site.

Condition 7.4.1 Environmental Performance Report

Operator to review the environmental performance of the site and to submit an annual report by 1st March each year. Report outstanding for 1st March 2008 and 1st March 2009.

Aggregate Washing Plant (exempt operation) - Compliance with WRAP Aggregates Protocol

(Assessed as an associated duty of care for waste material leaving EAWML/50066)

Photograph 7 – Aggregate washing plant



The fixed washing plant is located at the rear of the site behind the transfer building. Operations are carried out under a paragraph 13 exemption. Waste streams permitted under the activity include demolition or construction material, ash, slag, clinker, rock, bark, paper, straw or gypsum.

The plant is producing a variety of mixed products - 6F2, Type 1 and Type 2 sub base (MOT), pipe bedding (eg. 4-20mm), aggregates for use in concrete and

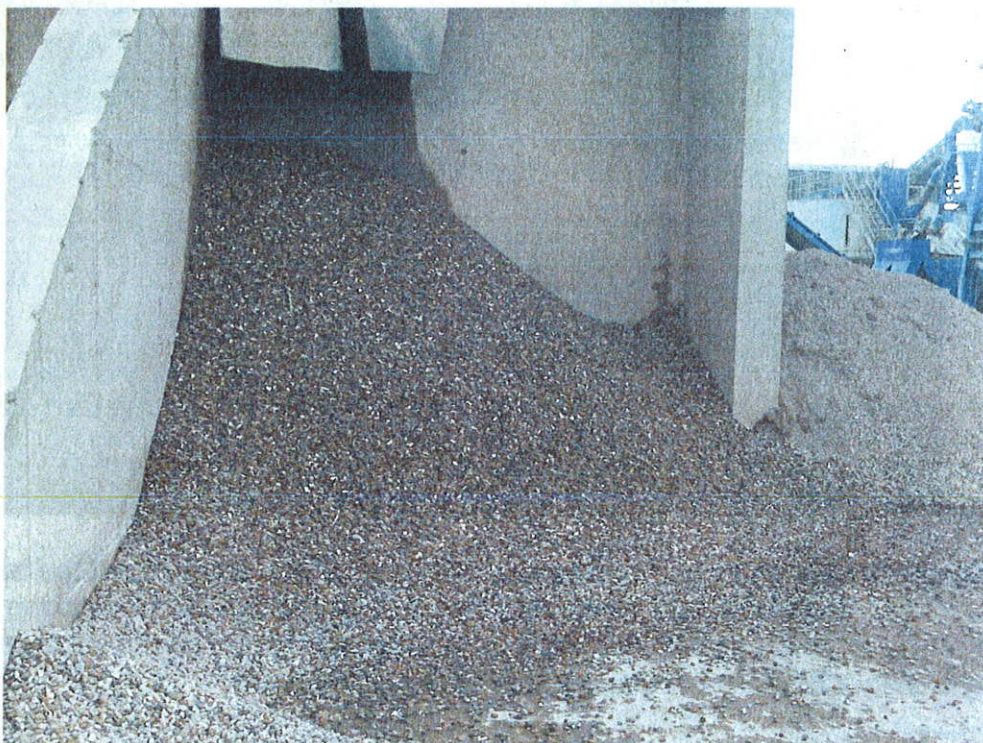
Title	Audit report form for Nick Brookes			
No.	EAWML/50066	Status:	Version 1	Issue Date: 23 July 2009
				Page 9 of 15

washed sand.

Photographs 8 – Product washed sand



Photograph 9 – Product washed aggregate



Title	Audit report form for Nick Brookes			
No.	EAWML/50066	Status:	Version 1	Issue Date: 23 July 2009
				Page 10 of 15

Photograph 10 – Clearly define storage product bays



The mixed HCL and construction and demolition waste is originally accepted under the permit EAWML/50066. The waste is then processed by the trommel and from this the operator estimated that approximately 95% of the current feed flow of waste (fines) from the transfer station is sent to the wash plant. Approximately 5% of brick and concrete material is tipped at the rear of the washing facility. The majority of this material comprises of Utilities tipping on site.

Photograph 11 –Trommel feeding the fines from the transfer station to the aggregate washing plant

Title	Audit report form for Nick Brookes				
No.	EAWML/50066	Status:	Version 1	Issue Date:	23July 2009
					Page 11 of 15



The inert material is blended and rinsed and the are fines removed. Polymer and anti foam products are added to aid separation. A log washer takes off any floatable which are removed via a trash screen. The trash is stored in two bays and the material taken to landfill.

Photograph 12 – Stockpile of unsuitable material arising from the wash Plant which are taken to landfill



The fines are taken out and graded. The sludge sinks and is then held in a holding tank. From here the sludge is pressed in the press room to form silt and clay products. The sludge can be made into any consistency required and can make a good soil conditioner.

Photograph 13 - The Press room



Photograph 14 - The presses squeeze out the water and the clay drops to the ground. A full cycle takes approximately 30-40 minutes.



All the water used in the washing plant is recycled on site. There are 5m deep tanks that hold the water and can contain enough volume to operate the plant for one full day. Water is pulled off the front yard to be recycled on site and used for dust suppression.

Waste accepted onto site has an accompanying waste transfer note. All incoming waste is weighed and records are held on site on an electronic database. The loads are visually checked at the weighbridge.

There is currently no waste acceptance criteria testing on waste that are internally transferred to the aggregate production location. Any chemical results will require assessing against WAC for inert waste. A visual check is not sufficient.

Quality Management System (also know as FPC)

A key element of the Protocol is the Factory Production Control (FPC) which is a control system to monitor production so that the product characteristics are achieved and maintained consistently. The FPC should include a Method Statement of Production (MSP), describing the waste recovery process and the range of products that are produced. The site will need to develop a FPC and MSP for the wash plant operation.

The site currently does not have a documented Quality Management System for the production of aggregates.

The QMS will need to cover the wash plant operation and document the following:

- Management and staff responsibilities
- List of wastes accepted onto site
- Procedure for the receipt of materials
- Procedure for non-conforming waste
- Description of products manufactures
- Description of processes used on site
- Testing schedule and procedures
- Record management

To develop a Quality Management System for the Production of Aggregates please use the following link:

[http://www.agregain.org.uk/quality/introduction to the quality management system/index.html](http://www.agregain.org.uk/quality/introduction%20to%20the%20quality%20management%20system/index.html)

The site produces a range of products to specifications. Testing is undertaken by Murray Rix and PTS (both UKAS accredited). However the site requires a defined testing procedure and sampling and testing frequency. This should meet the requirements of testing as set out in the protocol. The products that are produced on site must also state which British Standard they meet.

Training records are required to show that appropriate training has been provided and those responsibilities are clearly defined.

Title	Audit report form for Nick Brookes			
No.	EAWML/50066	Status:	Version 1	Issue Date: 23July 2009
				Page 14 of 15

The outgoing product material is currently sent on a duty of care transfer note. The current software does not allow admin changes to the description of paperwork. However the documentation will require changing so that it states that the aggregate to a produced to a quality scheme meeting the quality protocol.

Part Five – Actions / Recommendations

The transfer station is a well managed site. Both the TCP and Operations Manager had a sound understanding of the operations and procedures and fully co-operated with the auditors.

The audit identified actions that need to be addressed to ensure compliance with the waste management permit.

Aggregate Washing Plant / WRAP Protocol

Uncontaminated inert waste can be processed under the acceptance criteria of the WRAP Aggregates protocol. It is evident that the feed stock for the paragraph 13 activity comprises of pre-mixed material - HCL waste and construction / demolition waste, and it does not fit the criteria of the exemption.

Operator is requested to submit proposals to demonstrate compliance with the Paragraph 13 exemption and WRAP Aggregates Protocol.

The site will need to develop a Factory Product Control and a Method Statement for the wash plant operation. This will formulate a documented Quality Management System for the production of aggregates.

Part Six - Report Approval

Lead auditor	Rachel Argyros	Signed		Date	
Report authorised by	Tom Thornett	Signed		Date	
Job title	Team Leader Environment Management				

Title	Audit report form for Nick Brookes				
No.	EAWML/50066	Status:	Version 1	Issue Date:	23 July 2009
					Page 15 of 15