

Audit Report form



**Cyfoeth Naturiol
Natural Resources**
Cymru Wales

Part one- Audit reference information

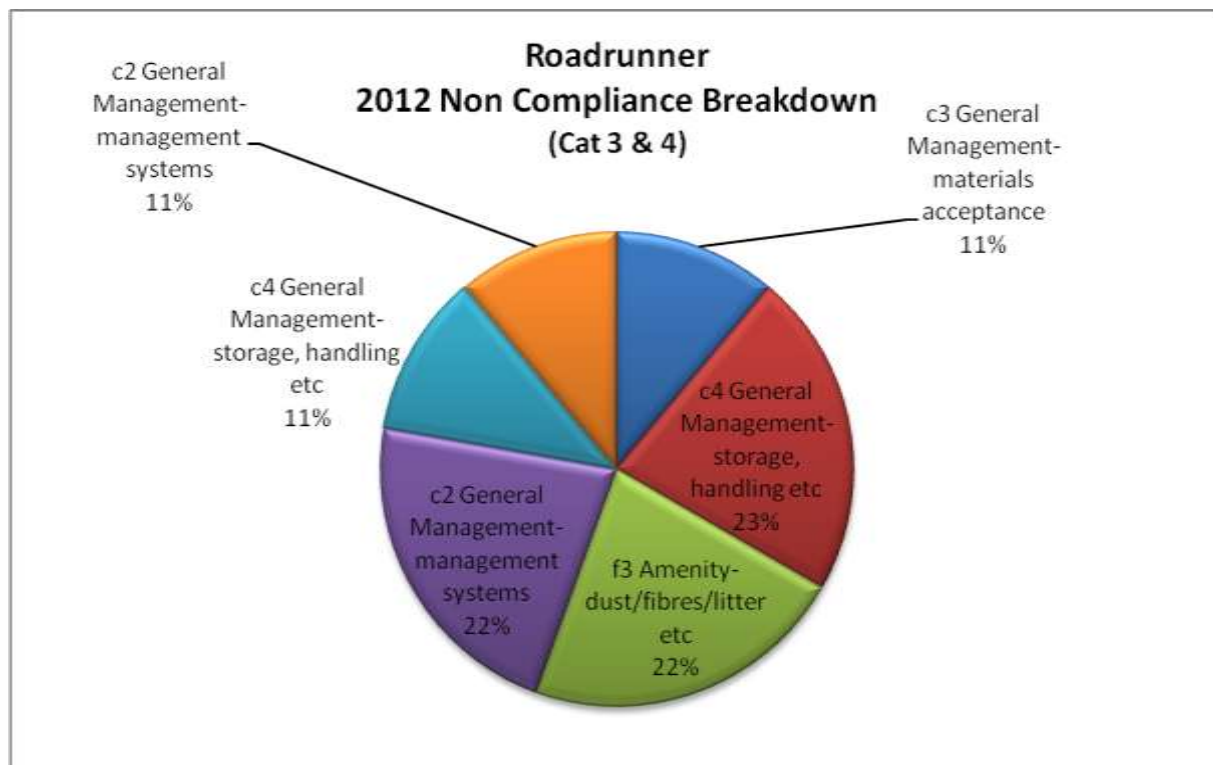
Permit number	EAWML 37214	Site name	GT Roberts and Son Ltd, Roadrunner Waste
Date(s) of audit	24 July 2013	CAR ID No.	37214/0187795
Lead auditor	Matt Buckley-Rees	Other auditors	Mefty Haider

Part two - Scope of audit

GT Roberts and Son Ltd is the owner and operator of a non-hazardous waste transfer Station in Bagillt. A permit authorising the keeping and treatment of controlled waste on land was granted to Roadrunner Waste Ltd in the year 2000. The permit has been modified since that time and was transferred to GT Roberts and Son Ltd in 2013.

The current CCS OPRA banding for the site based on data from 2012 is Band C.

The audit will focus on a series of permit conditions relating to the management system and site records, to assess any continued non-compliances or improvements with permit conditions.



The site has an Environmental Management System in place. Previous site inspections have recorded that the procedures detailed within the EMS are not always followed by the operator. The audit will look at aspects of the EMS to ensure it is being fully implemented.

The audit will focus on the following permit conditions and sections in the EMS:

1. Table 1.1 of the 2012 modification. The maximum storage capacity for waste pending operations, and the maximum amount of waste received on site will be 75000 tonnes. How do they monitor waste quantities on site to maintain compliance with this condition? Is the waste being stored in the appropriate location according to the site plans?
2. Section 4.8 of the management system, Control of Fire.
On previous inspections, there have been comments regarding the prevention of fires on site. The Environmental Management System has specified steps on control of fire on site, the audit will look at what records are made to show that site staff and management are trained to follow these steps.
3. Section 3.2 of the management system, Checking in and inspection of loads. Can the operator demonstrate that they are working in accordance with the procedures written in the management system.
4. Section 4.4 of the management system, Control and monitoring of dust. The audit will look at the measures in place for dealing with dust emissions , i.e. have the measures specified in the site management system been implemented?
5. Section 5 of the management system, Site Records. Are the site keeping appropriate records? Do they check duty of care notes, do they have the appropriate coding and information on the duty of care notes?

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-criteria	Comments and suggested corrective action	Proposed date for completion	CCS score 4 – 1	Natural Resources Wales proposed response
1.2.2, Table 1.1	B4, C2, C4	The operator explained that he uses a visual check to estimate the volumes of waste that are on site. Current estimates are that the stockpiles of waste are within permitted limits. It was also seen that the site plan does not accurately reflect the waste storage. ACTION: a system to be implemented on site to accurately record the volumes of waste being stored on the site, so the operator will have an accurate figure available. An updated site plan to be implemented, and a copy sent to Natural Resources Wales.	30 September 2013	4	Monitor stockpiles of waste on site during compliance visits
4.3.2	D2, C1	The operator explained that a health and safety advisor had drawn up a series of updated risk assessments and plans to cover the site operations. Staff had not received training in all aspects of these. On 2 nd August, the site operatives will be given a 'toolbox talk' on topics including the fire action plan. ACTION: the operator to ensure that records are completed to demonstrate staff awareness of the fire action plan.	02 August 2013	3	Site records to be inspected following the 2 nd August to verify the action is completed.
4.4.1	C1, C3	The operator informed the officers that waste loads are checked as they are tipped on the site, by either the permit holder or another member of staff. Permit holder perceives that the waste received on site is mostly from construction/demolition sources. As such, the site records waste under a select range of EWC codes ACTION: As per the description for permit condition 1.2.2 and table 1.1 above, the operator is to implement a recording system for waste entering the site, this should align with the requirements under section 3.2.1 of the site Management System.	30 September 2013	A	Recording system to be inspected at next inspection.
6.1	F3, C1, C2	Efforts have been made to improve the dust management on site. During the visit, the sprinkler system on the main sorting shed was in operation. There was also a roadsweeper on site that the operator had used to clean the site haul roads. During discussions, the operator indicated that they will be getting some new equipment in the form of a type of mobile bowser to supplement the existing dust control measures ACTION: The operator to ensure that they are implementing the steps outlined in the Environmental Management System, and to review these as necessary.	30 September 2013	A	Effectiveness of dust control measures to be monitored

7.2.1	G2	The operator explained that they pre-select the codes for recording on transfer notes, according to the type of waste they are expecting. Some of the waste transfer notes were checked, and there appeared to be missing or incorrect information on these. ACTION: The operator to review waste transfer notes, and edit them as necessary, and to ensure that they are checking the notes produced by others in connection with waste from the site.	30 September 2013	4	Waste transfer notes to be inspected during next inspection.

Permit condition 1.2.2 and Table 1.1

The permit holder was questioned on the procedures that are used by them to ensure they are not exceeding the storage limits set out in the permit. It was explained that this is done primarily through a visual assessment of the waste stockpiles, whereby the bays are filled until the waste is in line with certain physical features, for example the edge of the bay. When this point is reached, it is considered to be at the maximum storage level and no further waste is accepted here.

It would appear that there is no documented method of measurement undertaken that could be referred to, with respect to stored quantity of waste on site. It was agreed that the operator would review their existing computer systems, and carry out any changes that are required to enable an accurate figure for the amount of waste on site to be maintained. From walking around the site and seeing the waste storage areas, it was possible to see that the site drawing RW02 did not accurately reflect the setup on site in terms of waste storage areas. For example, an area marked as a turning circle is used for skip storage. The permit holder agreed that he would get a new plan for the site submitted.

Non-compliance scored as a CCS Category 4 Permit breach

ACTION: This will be implemented by the end of September 2013, and an updated site plan will be produced.

Permit condition 4.3.2

A discussion was held with the permit holder regarding the use of fire on site as a form of heating for employee welfare. Previous inspection forms had noted during cold periods that the operator should not burn waste on site. The operator accepted that this was a non-compliance, and wanted advice on what would be possible. A method that was suggested was that subject to health and safety requirements, wood that had been acquired as fuel and not waste, could be used to provide heat to staff members. The operator indicated that he would give this some consideration.

The permit holder explained that a Health and Safety consultant had been employed, part of their remit is that they undertake monthly visits to the site to audit H & S systems and provide training in the form of toolbox talks to staff members. The operator had paper copies of risk assessment matrices available for inspection, these covered a variety of the risks on site, relating to site operations. The operator confirmed that the next visit would include training for staff on the fire risk at the site. This visit from the consultant is scheduled to take place on the 2nd of August 2013. The operator demonstrated that an attendance sheet is signed by employees who are present when the talk takes place. The records showed that although staff had received training in some aspects of the activities associated with these risk assessments, they had not received training on all, particularly environmental risks.

Non-compliance scored as a Category 3 Permit Breach.

ACTION: The operator should ensure that staff are given the correct level of training and that the fire action plan is implemented and reviewed as necessary. The signed attendance sheet should indicate that training that took place on the 2nd August 2013.

Permit Condition 4.4.1

Waste acceptance checks. The operator was asked how waste is checked on delivery to the site, for compliance with the description provided. The procedure employed was described as such; the waste coming into site is widely to be expected as from two primary sources, this will be householders, or from construction/demolition activities. The waste is then tipped out at the main waste building and visually inspected, by one of two staff members. If any non-compliant waste

types are identified, then these are isolated and returned to the waste producer. The permit holder could recall one occasion over the past two years when he had to return some cement-bonded asbestos sheets to the producer but otherwise couldn't recall any other occasion when deposited waste had been returned to the producer. As with permit condition 1.2.2, it would appear that implementing an accurate recording system for incoming waste could be helpful in ensuring loads coming to the site are checked for waste acceptance.

Permit Condition 6.1

Control and monitoring of dust. The site had been the subject of complaints reported to Natural Resources Wales over the past couple of weeks, coinciding with a spell of fine weather. This section of the audit was to look at the measures the permit holder had implemented since they were notified of these complaints, and to see how they comply with and implement the steps for control and monitoring of dust as written in the Environmental Management System. The site had been visited by Natural Resources Wales to be notified of the complaints, and a request made for the permit holder to address the complaints.

The permit holder explained at the audit that they had ceased crushing operations approximately one month previously (permitted under a Part B Permit) as it had been observed that this had been generating higher levels of dust in the fine weather. The sprinkler system on the main shed was in operation, the officers observed that the spray heads appeared to be functioning well, there were no obvious blocked nozzles and they were creating an effective barrier across the front of the shed. Officers could also see that the site hardstanding and concreted areas were mostly clear of waste, and that the ground was still wet from being cleaned by the roadsweeper. The roadsweeper itself was still on site, in the area between the main waste shed and the one next to it. The permit holder also explained that they were planning to buy a type of mobile bowser with the aim of being able to supply a dust suppressant to the areas of the site that the fixed sprinklers cannot reach.

Permit condition 7.2.1

Waste transfer note documentation. The permit holder showed the officers some examples of waste transfer notes for the waste that leaves site. On examination of these notes, there were a few errors and inconsistencies apparent in the information contained within the note. For example, there was an entry on one note using EWC code 17 09 04 and the written description provided with this is 'general mixed waste'. 17 09 04 is in fact 'mixed construction and demolition waste', therefore this should be corrected, either changing the code or the written description for the appropriate one.

Non-compliance scored as a category 4 breach.

ACTION: The operator to review waste transfer notes, and edit them as necessary, and to ensure that they are checking the notes produced by others in connection with waste from the site.

PHOTOGRAPHS



Photograph above shows storage of material treated under the aggregate protocol



Photo above shows further aggregate, and skip containing cables hidden from public view



Photograph above shows further aggregate protocol material



Photograph above shows a general view of the aggregates recycling area



Photograph above shows some temporary skip storage in a waste bay



Photograph above shows a general view of the aggregate recycling area



Photograph above shows storage of soil and aggregate material



Photograph above shows roadsweeper and site drainage. Passes through to foul sewer via a silt trap



Photograph above shows an area being used for storage of baled recyclate



Photograph above shows baling machine and storage of light plastic.



Photograph above shows the main waste reception area



Photograph above shows the skips used on site for storing waste wood



Photograph above shows the main waste sorting building



Photograph above shows the exterior of the main waste building.



Photograph above shows a mixed construction and demolition waste bay within the main building



Photograph above shows mixed construction and demolition waste



Photograph above shows the main waste building, with dust suppressing sprinklers visible in operation on the pillars.

Part five – Actions/recommendations

- 1) A system to be implemented on site to accurately record the volumes of waste being stored on the site, so the operator will have an accurate figure available. To be completed by **30th September 2013**
- 2) An updated site plan to be implemented and a copy of the plan to be sent to Natural Resources Wales. To be completed by **30th September 2013**
- 3) The operator to ensure that records relating to health and safety training are completed to demonstrate staff awareness of the fire action plan. To be completed after **02nd August 2013**
- 4) The operator to ensure that they are implementing the steps outlined in the Environmental Management System with regards to dust control and management, also to review these as necessary. To be completed by **30th September 2013**
- 5) The operator to review waste transfer notes, and edit them as necessary, and to ensure that they are checking the notes produced by others in connection with waste from the site. To be completed by **30th September 2013**

Part six - Report approval

Lead auditor	Matthew Buckley-Rees	Signed		Date	22/08/2013
Report authorised by	Mandy Langstaff	Signed		Date	23/08/13
Job title	Acting Team Leader Environment Management				