

AUDIT FINDINGS REPORT.

Permit No.BX4909IR

Site :	Tockwith Transfer Station
Operator:	BCB Environmental Management Ltd Unit 10A Marston Moor Business Park Tockwith York YO26 7QF
Site Address	BCB Environmental Management Ltd Unit 87. The Green Hanger Marston Moor Business Park Tockwith York YO26 7QF
Date/Time:	5 th February 2008. 10:00 – 13:15
Purpose of Audit:	The aim of the audit was not to look at every aspect of the permit but to concentrate on three particular issues
Scope:	<ol style="list-style-type: none"> 1) Waste acceptance procedures 2) Sampling procedures 3) Hazardous waste paperwork
Lead Auditor:	Diane Jobson – Waste acceptance and sampling procedures
Accompanying Auditor(s):	John Crowl- hazardous waste paperwork
Other Persons Present:	Representatives of BCB Environmental Management Ltd : Mike Wilson (Site manager)
Site Status:	At the time of the audit the site was operational and accepting waste for transfer. The amount of waste being stored on the site has dramatically reduced over the last few months. This is due to better management of the site. The site is tidy and is regularly swept to keep it clean. No leaks or spills were noted during the audit.
Background Information:	Tockwith transfer station is situated within Marston Moor Business Park on the

	<p>outskirts of Tockwith village. The site is permitted for the transfer and bulking of waste. This includes hazardous wastes, both liquid and solid. BCB Environmental Management Ltd were issued with a PPC Permit on 14th March 2005 for this site.</p>	
Procedure:		Responsibility:
Preparation	<p>The local area 'virtual' PPC team have pre-determined an audit programme for all relevant sites in the area Local inspector DJ, had identified 3 issues to target, namely:</p> <ol style="list-style-type: none"> 1) Waste Acceptance Procedures 2) Sampling Procedures 3) Hazardous waste paperwork <p>Contact was made with Mike Wilson of BCB Environmental Management Ltd informing of the planned audit. A suitable date was arranged</p>	<p>'virtual' PPC Team</p> <p>DJ</p>
Audit Methodology	<p>Each individual team member was responsible for targeting and planning their part of the audit.</p>	DJ, JC
Report	<p>Each individual auditor has compiled the report relating to the relevant section investigated. Each report is given below</p>	DJ,JC
Health and Safety:	<p>As a pre-planned visit, arrangements were made to ensure that Agency staff, were accompanied at all times.</p> <p>The generic risk assessment for inspecting hazardous waste transfer sites was considered.</p> <p>The local site inspector did not highlight any specific health and safety concerns.</p> <p>PPE was worn in accordance with the operators instructions.</p> <p>No incidents or near misses were recorded, involving the audit team, or accompanying staff.</p>	All
Supporting Documents/ items:	<p>PPC Permit BX4909IR Decision document</p> <p>Application form and related documents Working Plan</p>	N/A

AUDIT FINDINGS REPORT.

Permit No.BX4909IR Waste Acceptance and Sampling Procedures

Site :	Tockwith Transfer Station
Operator:	BCB Environmental Management Ltd Unit 10A Marston Moor Business Park Tockwith York YO26 7QF
Date/Time:	5 th February 2008. 10:00 – 13:15
Purpose of Audit:	To look at waste acceptance procedures
Auditor:	Diane Jobson

Permit Condition:	<i>Overarching Management Condition.</i>
1.3.1	Without prejudice to other conditions of this permit, the operator shall implement and maintain a management system, organisational structure and allocate resources that are sufficient to achieve compliance with the limits and conditions of this permit.
<p>Mike Wilson is the site manager and is the technically competent person for the site. A management hierarchy exists on the site and responsibilities can be delegated . This management structure has come about since Mike Wilson has been managing the site and has greatly improved working relations between the staff. Supervisors are allocated to distinct sections of the site such as sampling or waste acceptance. A new staff structure plan is being drawn up and is to be forwarded to the Agency.</p> <p>A working plan exists for the site which appears to be a comprehensive document. Various procedures are included from emergency procedures to Laboratory procedures. This is dated December 2003 and parts of it are dated March 2005. Both these dates are prior to the site operating and prior to the issue of the permit. It is now out of date. The laboratory procedures that I looked at were not the ones that are being followed by lab staff. Most procedures have been re-written.</p> <p>Mike Wilson was aware that the working plan was well out of date and has been working on it for some time to update the whole thing. This is nearing completion and should be completed towards the end of March 2008. It will be forwarded on completion to the EA.</p> <p>The permit is currently being updated by the Agencys permitting team and will be re-issued in a national format along with other such similar sites. This should bring it in line with BAT and the</p>	

sector guidance note S5.06.

Permit Condition:	<i>Management (and fit and proper person for specified waste management activities)</i>
2.3.2	<i>Training</i> The permitted installation shall be supervised by staff who are suitably trained and fully conversant with the requirements of this permit.
2.3.3	All staff shall be fully conversant with those aspects of the permit conditions which are relevant to their duties and shall be provided with adequate professional technical development and training and written operating instructions to enable them to carry out their duties.
2.3.4	The operator shall maintain a record of the skills and training requirements for all staff whose tasks in relation to the permitted installation may have an impact on the environment and shall keep records of all relevant training.

Training

Mike Wilson is the technically competent person for the site. BCB Environmental Ltd are encouraging staff to continue with relevant training. Ross Caulfield and Tobi Ansell are currently working towards COTC for the site.

Mike Wilson is aware that all staff need to be trained to a competency level appropriate to their particular post. A training programme has been set up for all staff which includes basics in PPC and the requirements of the permit amongst others. This has been developed in-house mainly by Mike. It consists of a series of short presentations.

Training is recorded electronically on a spreadsheet. Dates of when and who has been trained on what are recorded.

A separate training record is kept in the lab relating specifically to lab procedures. This is in paper format.

Permit Condition:	<i>Waste recovery or disposal</i>
2.6.4	The operator shall maintain and implement a system which ensures that a record is made of the quantity, composition, origin and delivery date of any waste that is received for disposal or recovery at the permitted installation

Waste acceptance procedures

These have been developed into an electronic system. All details are logged into spreadsheets.

This starts from when first contact is made from the producer of the waste to BCB's sales team. All details are logged at an early stage. Details of the potential waste are passed through to the site chemists for determination, this is Sally or Mike. A quote is then produced based on the individual waste types. If a waste is not acceptable to the site than it is highlighted at this stage.

If the producer then goes ahead and sends the waste to BCB it is logged as a job and a specific date is allocated for its acceptance. This ensures that waste is accepted spread throughout the week and it can be handled by the site staff.. Lauren or Amanda ensure that the vehicle is weighed in and that no obvious leaks / spills can be seen from it as it arrives on the weighbridge. Paperwork is checked and the vehicle is accepted into the hanger. Drums are off loaded by the lads in the

hanger and checks are completed to ensure that the correct number of drums have arrived that have already been booked in. Labels are printed off using hand held electronic devices and any irrelevant labeling is taken off or covered. A bar code system is operated

Sampling of the incoming waste then takes place. Every drum of every waste stream is sampled. If the waste is liquid in nature a core sample is taken. ie top, middle and bottom and mixed as one sample. A portion of each sample from each drum of the same waste stream is then poured into another bottle. This is not measured proportions but a little is taken from each sample. This then leaves one sample per waste stream. It is this sample that is then analysed.

This method obviously does not capture the composition of any drums slightly over limits as they may well be diluted by other drums.. Problems may also occur if a particular drum is labelled as one thing but then contains something else. The consequences of mixing such drums with non-compatible drums may cause problems.

A basic flow diagram is used to determine what tests are carried out on any particular waste stream.

If the quantity or description of the waste does not match that which is booked in then it goes to the quarantine bay. Similarly, if these basic tests show up any anomalies then the waste is quarantined.

Samples are stored for a minimum of two days before being disposed of. The sample that has been taken goes back into a drum of that particular waste stream and the glass bottles are washed out on site.

Site staff did not know where the washout water from the sample bottle washing machine ended up. It appeared that this had never been considered

**Permit
Condition:**

2.2.5.1

Fugitive emissions of substances to water and sewer

BAT should be taken into account for the emission of substances to water and sewer. Currently the wash water from the sample bottle washing machine is discharged and it is not known where it discharges to. This can contain a variety of substances, all-be-it in a diluted form.

Audit Findings Waste Acceptance and Sampling– Key issues / Actions

This site should be aiming to be operating to BAT – Best Available Technique and should be compliant with sector guidance note S5.06 'Guidance for the recovery and disposal of hazardous and non-hazardous waste'. The permit is being updated to reflect this along with other sites nationally.

A further audit is likely to be undertaken on issue with the up dated permit.

Condition 2.2.5.1

It should be investigated where the wash water from the sample bottle washer discharges to.

Condition 1.3.1

Paperwork needs to be brought up to date. (This is in the process of being sorted out and is expected to be completed by end of March 2008)

Audit Findings (waste acceptance and sampling)– CCS Breaches

Condition 1.3.1	Working plan and procedures to be up dated	Cat 4