



Environment  
Agency

## Waste Audit Report

**This form will report compliance with environmental legislation as determined by an Environment Agency Officer**

		Permit Ref	403958	
Operator / Permit holder		Wicks Services Limited		
Date		20/09/2018		
		Time in	13:40:00	Out 14:35:00
Premises	Installation	Waste Permit	x	Exemption
		Producer		CBD
Site contact (s)		Mr David Wicks		
Officer's name (s)		Jenny Rockliffe, Will Morgan		Date issued 05/10/2018

### Section 1a Assessment Summary

This Assessment is based on the Hazardous Waste (England and Wales) Regulations 2005

A detailed explanation of any non-compliances identified and actions you may need to take are given in sections 2 & 4 below

Sector type	Others	National or Local campaign	National
Campaign name	ELV's	Where in waste chain?	Producer

### Compliance Summary

Compliance check type	Assessed during audit	Non-compliance identified
HW Consignment notes (waste received)	No	No
HW Consignment notes (waste removed)	Yes	Yes
Mixing / treatment of hazardous waste	No	No
HW Records and returns	Yes	No
Storage	Yes	No

### Section 2 – Waste Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- Any non-compliances identified
- All actions requested
- Details of advice given
- Any other areas of concern
- Any examples of good practice

Hazardous Waste Regulation compliance was assessed as part of the routine compliance inspection visit for Wicks Services Limited (Ltd.) The compliance assessment report (403958/0316190) for the compliance inspection should be read in conjunction with this audit report. Andy Orr (AO), the technical competent manager for the site, was present and assisted us during the inspection.

As part of this inspection we discussed site procedures for depolluting End of Life vehicles (ELVs). AO is aware that the RCF matting used in catalytic convertors is classified as a Category 1B carcinogen and they need to be consigned from site (consignment notes were reviewed-see below).

AO confirmed that Shocks absorbers are fully drained as part of the ELV depollution process and the equipment for this was seen at the time of inspection.

We discussed the need for airbags and seatbelt pre-tensioners to be deployed in order to be considered fully depolluted and before the ELVs are crushed, baled or shredded as they contain explosive devices. **Failure to do so will mean**

**the vehicle is hazardous waste and can only be removed from site using consignment notes.** The Health and Safety Executive (HSE) have guidance on the safe handling and storage of air bags and seat belt pre-tensioners, which can be found via the following link:

<http://www.hse.gov.uk/pubns/indg280.htm>

The site uses a third party company to drain any air conditioning gas which may be present in the ELVs. This company has f-gas certification (certificate reviewed, expiry 10/02/2020) and the site holds records of how much gas is drained and provided to the company for re-use.

**Comment-** Air conditioning gas recovered from ELVs is a hazardous waste and must be consigned from site for reprocessing or incineration. It may be possible to recycle F-gas from air conditioning systems as it recovered but it will need to go through a 'cleaning' process to be suitable for re-use. For further information, please use the following link:

<https://www.gov.uk/guidance/recover-f-gas-when-disposing-of-equipment-and-insulating-foam>

We also discussed the requirement for switches containing mercury to be removed. The ELV Directive does require switches which contain mercury to be removed. However, it is recognised that it would be a long and costly process to remove all switches in case they contain mercury. Therefore an acceptable level of depollution will be achieved if any switches which are clearly marked as containing mercury are removed. A visual inspection of areas which contain this type of switch must be made during the depollution procedure, but only switches which are clearly identified as containing mercury need to be removed.

During the inspection we discussed the movement of hazardous waste received/transferred from site. A consignment note is required for all movements of hazardous waste and must accompany the waste to the final destination. There are some unusual circumstances where consignment notes are not required, such as the movement of domestic hazardous waste (other than asbestos waste) from a domestic household to an initial collection point e.g. ELVs from domestic customers. For more information please use the following link:

<https://www.gov.uk/guidance/hazardous-waste-consignment-note-supplementary-guidance>

- A review of the Site's catalytic convertor consignments revealed that although Wick Services Ltd are the consignor (producer/ holder) of the waste the consignment note code has been produced using the consignee (receiver) of the waste. This is not the correct format for creating a consignment note code.

A consignment note code must be created for each consignment and entered onto the consignment note. The format for the consignment note code must be 'XXXXXX/YYYYY (part A2 of consignment note):

- with the 'XXXXXX' being the first 6 letters or numbers (not symbols or spaces) of the name of the company entered in part A2 of the consignment note (if your company name has less than 6 letters or numbers, assign a 'Q' for the remaining spaces) and must be followed by '/'
- And 'YYYYY' being five unique numbers or letters (not symbols or spaces) of your choice. **You must change the 'YYYYY' to create a different code each time waste is consigned from that premises.**

The two extra grey boxes at the end of consignment note code in part A2 should not be filled in except in the following circumstances:

- a 'V' to waste removed from ships - 'XXXXXX/YYYYYV'
- an 'F' to fly-tipped waste - 'XXXXXX/YYYYYF'
- a 'D' to waste moving under a consignee return derogation - 'XXXXXX/YYYYYD'
- a 'P' to continuous piped waste
- For rejected loads (further information in the rejected load guidance: <https://www.gov.uk/guidance/hazardous-waste-rejected-loads-supplementary-guidance> ).

**The consignment code should be created by the consignor (producer/holder) of the hazardous waste and based on the consignor company details.**

- Of the consignment notes reviewed not all had been correctly completed. The consignment note has 5 parts (A to E). Each part must be filled out in order, by the right person, at the right time:

**The carrier** must check parts A and B of the note, and complete part C after the producer or holder has completed parts A and B and before the waste is removed. Once you have signed part C you must hand all copies back to the consignor (producer or holder).

**The consignee (receiver)** of the waste checks the waste and the note and either accepts or rejects the waste. They complete part E to confirm they have checked the delivery of waste and whether it has been accepted or rejected. For further information on how to correctly complete a consignment note (including the correct format for consignment note codes) please use the following link:  
<https://www.gov.uk/guidance/hazardous-waste-consignment-note-supplementary-guidance>

As a producer/holder of hazardous waste the site should receive consignee returns every quarter from the consignee accepting/ treating your hazardous waste. These returns are necessary to keep for your records. Therefore if you do not receive them you should ask for them in writing. If a business is not producing consignee returns you should stop using them and inform the environment agency.

<p>You must take immediate action to rectify any non-compliance noted in section 1 and prevent repetition. Non-compliance with environmental legislation may result in enforcement action being taken, including criminal prosecutions.</p> <p>Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.</p>	
<p>Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.</p>	<p>x</p>
<p>We will now consider what enforcement action is appropriate and notify you, referencing this form.</p>	

[illegible]

## Section 5 - Compliance notes

To ensure you correct actual or potential non-compliance we may

- advise on corrective actions verbally or in writing
- require you to take specific actions in writing
- issue a notice

Non-compliance with environmental legislation is an offence and we may take legal action against you.

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action may include the issue of a formal caution or prosecution.
- Dependent upon the type of offence committed, a civil sanction Enforcement Undertaking (EU) offer may also be available to you as an alternative enforcement response.

**See our Enforcement and Civil Sanctions guidance for further information**

**Not all legal requirements were assessed as part of this audit. It remains your responsibility to ensure that you comply with all relevant environmental legislation and maintain suitable records to evidence your compliance.**

## Section 6 – General Information

### Data protection notice

The information on this form will be processed by the Environment Agency to fulfill its regulatory and monitoring functions. The Environment Agency may also use and/or disclose it in connection with:

- offering/providing you with its literature/services relating to environmental matters
- consulting with the public, public bodies and other organizations (e.g. Health and Safety Executive, local authorities) on environmental issues
- carrying out statistical analysis, research and development on environmental issues
- investigating possible breaches of environmental law and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information Regulations request.

The Environment Agency may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

### [Customer charter](#)

#### What can I do if I disagree with this waste assessment report?

If you are unable to resolve the issue with your Environment Agency Officer, you should firstly discuss the matter with the officer's line managers. If you wish to raise your dispute further through our official [Complaints](#) and Commendations procedure, phone our general enquiry number 03708 506 506 (Mon to Fri 08.00–18.00) and ask for the [Customer Contact](#) team or send an email to [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk). If you are still dissatisfied, you can make a complaint to the Ombudsman. For advice on how to complain to the [Parliamentary and Health Service Ombudsman](#), phone their helpline on 0345 015 4033.