

WASTE DISPOSAL LICENCE AUDIT REPORT

PUBLIC HEALTH ACT 1990

COLLECTION AND DISPOSAL OF WASTE REGULATIONS 2000

LICENCE NUMBER: **WDL/01/2017/v1**

FACILITY TYPE: **TRANSFER STATION**

INSPECTION DATE: 24/06/2022

INSPECTION LEAD OFFICER: E.Goosey

SITE OVERALL RATING: **EXCELLENT**

EMC RATING: **HIGH**

ELC RATING **NO BREACH**

NEXT INSPECTION: 24 Months

REVIEWED BY OFFICER: E.Goosey

POSITION: Environmental Protection Officer

SIGNED _____

DATE 09/02/2022

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Terminology

DEFA	Department of Environment, Food and Agriculture
Department	Department of Environment, Food and Agriculture
ELC	Environmental Licence Conditions
EMC	Environmental Management Conditions
EPU	Environmental Protection Unit
EQS	Environmental Quality Standards
Officer	Environmental Protection Unit Officer
Scheme	WDL Assessment Scheme
WDL	Waste Disposal Licence

Introduction

The compliance assessment scheme is designed to promote effective supervision of licensed activities and explain the steps that the Department may take for the purposes of ensuring:

- a) that the activities to which the licence relates do not cause pollution of water, danger to public health or become seriously detrimental to the amenities of the locality; and
- b) compliance with the conditions in the licence.

The scheme is restricted to assessing compliance with the performance of any prescribed functions under section 57 to 64 of the Public Health Act 1990 and in connection with the conditions of the disposal licence. The scheme is focused on the compliance of a licence holder with their licence and not on the inherent hazard which the activity may present.

The aims of the licensing system set out in sections 57 to 64 of the Act are, in brief:

- a) to ensure that waste treatment and disposal is carried out with no unacceptable risk to the environment and to public health, safety and amenity;
- b) to ensure that changing patterns of waste disposal do not prejudice objective (a) above and equally that those responsible for waste treatment and disposal take proper advantage of technical progress;
- c) to give licence holders a clear idea of what operating standards are required of them;
- d) as a result of c) above to secure the provision of sufficient facilities for the treatment and disposal of waste;
- e) to ensure that sufficient information is available to the responsible authorities to enable them to fulfil their statutory duties.

The assessment will be conducted against conditions listed in your waste disposal licence and through the assessment listed in (Guidance Document: Waste Disposal Licence Compliance Assessment Scheme available online). The assessment outcome will be an overall ranking for the site, ranging from 'excellent' to 'very poor'. Future site compliance assessments will be undertaken on a schedule defined by the past compliance rating.

Rating	Site Compliance	Visit Schedule* Micro or small/medium/large
Excellent	Fully compliant with licence conditions.	24/18/12
Good	Not quite fully compliant; one or two areas highlighted for improvement to achieve 'excellent'.	18/12/12 months
Adequate	Broadly compliant with licence conditions but several areas highlighted for improvement.	12/6/4 months
At risk	No breach of limit conditions but low management performance indicates possible slippage and potential future breaches	6/4/3 months
Poor	Non-compliant with licence conditions for at least one significant breach.	3/2/1 months
Very Poor	Significant non-compliance, with urgent improvements across multiple areas.	monthly

*Given no significant changes or events during this period. If an environmental event occurs the assessment may be revised or re-conducted at any time based upon new information or data.

Compliance assessment sheets (containing licence number, regulatory regime and licence name) will be made available to the public on request. The overall compliance rating (see table) for each licence will be made available on DEFA's website. For more information, please see the WDL Assessment Scheme Document online.

Planning Review

Planning Number	16/00875/B
Planning Covers all Current Waste Activities?	YES
Action Required?	YNO
Description of Actions:	n/a
Deadline:	n/a

Site Incidents

Recorded issues or breach of licence conditions during last 12 months or period from last inspection.

n/a

Waste Disposal Licence Audit Overview

Section 1: General

No conditions under this section were reviewed during the licence.

Section 2: Waste Types

The wastes collected were in line with the EWC codes permitted in the licence. Around 401 tonnes were reported to have been processed in 2020. The licence calls for 400 tonnes per annum, the site was within 5% of their permitted allowance. If exceedances of greater than 5% are to become a usual occurrence a review of the licence should be conducted.

The site was very tidy and minimal waste around. During loading approximately 26 tonnes of paper are loaded in the parking area. Following this, the site is swept to prevent any escape of blown litter.

The waste generated on site is either shipped via Green List, Annex VII notification, or is passed onto other companies for shipping. This is the case for hard disks. The company destroys hard drives, but passes the waste onto a second company (Mann Waste Recycling) for disposal.

2.1	Permitted Waste Types	15 01 01; 16 02 15*; 16 02 16; 20 01 01 ; 20 01 35*; 20 01 36	Processing paper, cardboard and some hard drives and computers for clients destruction.	HIGH
2.2	Permitted Waste Quantities	400 tonnes paper	401 tonnes sent in 2020	HIGH
2.2.3	Wastes shall not be allowed to accumulate unnecessarily on site, and should be removed in advance of storage capacities being exhausted.		Site was tidy, with minimal waste stored. The waste is gathered and sent out regularly on a 26 tonne load.	HIGH
2.3	Transfrontier Shipment of Waste and Annex III 'Green Waste' Export	Any waste that requires export from the Island, the license holder must ensure compliance with the Isle of Man Import and Export Regulations. The license holder must make contact an authorised officer of the Department prior to exporting the waste off the Island.	All waste is sent via green list, or WEEE is sent to on island recycler.	HIGH

Section 3: Waste Recovery Options

Due to the nature of the business all waste is handled in a confidential manner, and thus all processing and treatment of waste is conducted indoors. All site entrances are in good repair and the site appears to be well managed with appropriate site office, facilities and infrastructure.

3.1.6	The integrity of the security installation shall be inspected, maintained and repaired as soon as practicable.	In any event, a temporary repair shall be made within 24 hours pending completion of permanent repairs.	All waste activities conducted indoors except for the loading of the vehicles. All buildings are secure and locked.	HIGH
3.1.7	A suitable site control office shall be provided and maintained at the site.	It shall be equipped and manned to allow the requirements of the conditions of this licence to be satisfied.	Suitable office	HIGH

Section 4: Environmental Control Measures

No liquids are stored on site.

4.3.3	Storage area for fuels and oils shall be located in a secure area and within a bund having of not less than 110% of the largest tank or 25% of the total volume of the tanks located therein (whichever is the greater).	A locked storage area is provided, however there is little use for these materials on site, and there is little stored in the cages.	HIGH
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Section 5: Site Operations

The site is tidy and incoming and outgoing wastes are clearly delineated within the site.

5.4	Waste Storage	All waste shall be stored in dedicated bays both before and after processing.	Wastes before and after processing are clearly delineated and separated within the compound	HIGH
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Section 6: Site Records

The annual returns were produced in a timely manner.

6.1	Waste and Material Outputs	A record shall be kept of all wastes delivered to and removed from the site.	annual returns provided	HIGH
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<i>EMC RESULT</i>	HIGH
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Environmental Licence Conditions

The licence does not include any environmental licence conditions for review.

<i>ELC RESULT</i>	NO BREACH
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WDL Audit Result

<i>RESULT</i>	EXCELLENT
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Audit Summary and Advisory Notes

OVERALL RESULT	EXCELLENT
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Date	24/06/2022
Officer	E.Goosey
Officer	

Overall Rating	EXCELLENT
Next Visit	24 months

Site Name	Doxbond Ltd
WDL	WDL/01/2017/v1
Discharge Licence	n/a
Site Address	Unit 25A Colas Drive, Balthane
Type of Facility	Transfer Station
Contact Name	Matt Oakes
Position	Manager
Contact Telephone	
Contact Email	recycling@doxbond.com
Site Size	Small

ELC Rating	EMC Rating	Incidents
No Breaches	HIGH	0

Advisory Issues:	

Appendix A: WDL Audit Assessment

Section	Condition	Details	Inspection
1.1	Site Covered by Licence and National Grid Reference	This licence and its conditions shall apply to the areas (hereinafter called 'the site') edged in red on drawing Nos. 1525-001 and 1525-002 submitted with Planning Application Reference 16/00875/B dated 27 July 2016	
1.2	Modifications and Revocation of Licence	This licence is valid from the date of issue but may be modified or revoked by the Regulator where it appears that activities to which the licence relates may cause pollution, danger to public health or detriment to the amenity of the locality.	
1.3	Changes to the Working Plan	Any proposed modification to the approved working plan shall be submitted to the Department and shall not be implemented until the written approval of the Department is obtained, unless it is necessary to prevent pollution, danger to public health or serious detriment to the amenities of the locality.	
1.4	Authorised Activities	This licence authorises the reception, sorting, processing, storage, and transfer of controlled waste (as specified in sections 2 & 3 of this licence), pending final disposal or use elsewhere. This licence also authorises the use of plant and equipment for the above mentioned purposes.	
1.5	Operation of the Site	The site shall be operated in accordance with the following licence conditions and in accordance with the methods of operation described in the working plan. The conditions of this licence shall take precedence over any operational statements made in the working plan.	
1.6	Display of Licence and Working Plan	This licence and its conditions shall be made known to any person who is given responsibility for the management or control of the site, and a copy of this licence and the approved working plan shall be displayed at the site control office which should be established at the site.	
1.7	Contact Details	The licence shall submit to the Regulator the names, addresses and telephone numbers of responsible persons for contact in the event of an emergency, during normal operating hours and outside normal operating hours. Any change in these details shall be notified in writing in advance to the Regulator.	
1.8	Permitted Hours of Operation	Mon-Thur 0730-1545 Fri 0700 - 1515	
1.9	Site Inspections	Access to the site shall be available at all reasonable times for inspection by a authorised officers from the Department.	
2.1	Permitted Waste Types	15 01 01 16 02 15* 16 02 16 20 01 01 20 01 35* 20 01 36	Processing paper, cardboard and some hard drives and computers for clients destruction.
2.2	Permitted Waste Quantities	3 tonnes WEEE	
		400 tonnes paper	401 tonnes sent in 2020
		18 tonnes cardboard	
	Wastes shall not be allowed to accumulate unnecessarily on site, and should be removed in advance of storage capacities being exhausted.		Site was tidy, with minimal waste stored. The waste is gathered and sent out regularly on a 26 tonne load.

2.3	Transfrontier Shipment of Waste and Annex III 'Green Waste' Export	Any waste that requires export from the Island, the license holder must ensure compliance with the Isle of Man Import and Export Regulations. The license holder must make contact an authorised officer of the Department prior to exporting the waste off the Island.	All waste is sent via green list, or WEEE is sent to on island recycler.
3.1	General Management, Notices and Signs	The Operator Shall Manage and Operate the Activities:	
		In accordance with a written management system or working plan that identifies and minimises risks of pollution including those arising from operations, maintenance, accidents, incidents, non-conformances, closures and those drawn to the attention of the operator as a result of complaints;	
		Using sufficient competent persons and resources;	
		In accordance with a traffic management plan; and	
		In association with a Fire Prevention Plan approved by the Department.	
		Records demonstrating compliance with conditions shall be maintained and made readily available upon request by authorised officers of the department.	
		A site identification board of durable material and finish shall be prominently displayed at the site entrance and is maintained in a legible condition.	
		The site identification board shall show the following details	
		(i) name of the site;	
		(ii) licence reference number;	
		(iii) hours when the site is open;	
		(iv) name and contact details of the operator & the Department of Environment, Food and Agriculture.	
		Suitable security shall be installed and maintained to prevent unauthorised access to the site.	
		The integrity of the security installation shall be inspected, maintained and repaired as soon as practicable. In any event, a temporary repair shall be made within 24 hours pending completion of permanent repairs.	All waste activities conducted indoors except for the loading of the vehicles. All buildings are secure and locked.
		A suitable site control office shall be provided and maintained at the site. It shall be equipped and manned to allow the requirements of the conditions of this licence to be satisfied.	Suitable office
		All features of the sites infrastructure shall be subject to regular inspection and maintained in a good state of repair.	
4.2	Control of Fires	These conditions do not permit the burning of any wastes, either in the open, inside buildings or in any form of incinerator.	
		Site staff will be instructed to treat any fire on the sites as an emergency and to take the following action:	
		Isolate the burning area until the fire is extinguished;	
		Notify the Fire Brigade immediately and the Department of Local Government & the Environment;	
		Attempt to extinguish the fire, if trained to do so and utilizing approved extinguisher equipment, or evacuate the site if this is not possible.	
		All such outbreaks of fire shall be notified forthwith to the Regulator and recorded in the site diary.	
4.3	Control of Dust	All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.	
		Any spillage of oil/fuel etc on the site shall be dealt with immediately to clear or alleviate the spillage. Adequate quantities of absorbent material shall be on hand at all times, and provision shall be made for the disposal of contaminated absorbent materials to a suitably licensed disposal facility.	

		Storage area for fuels and oils shall be located in a secure area and within a bund having of not less than 110% of the largest tank or 25% of the total volume of the tanks located therein (whichever is the greater).	a locked storage area is provided, however there is little use for these materials on site, and there is little stored in the cages.
4.4	Control of Surface Water Run-Off	These conditions do not allow any point source emission into surface waters or groundwater. Clean surface water from wastes storage and treatment areas may only be discharged directly to surface waters, or to groundwater via a drainage system designed and constructed so surface water discharged does not adversely impact the water quality of water bodies, both during construction and when operational.	
		There shall be no discharge of contaminated water to any surface water drainage system. Surface water discharges from the site shall be free of visible oil or grease, and suspended solids shall not exceed 60 mg/l.	
4.5	Control of Birds, Vermin and Pests	Precautions shall be taken as specified in the working plan to prevent the infestation of birds, vermin or insects on the site.	
		A specialist contractor shall be employed to control pest infestation at the site.	
4.6	Control of Litter	Measures shall be taken, as specified in the working plan, to ensure that all loads of waste being transferred from the site are adequately compacted and bailed.	
		Measures shall be taken to contain windblown materials within the site. In the event that windblown materials are carried off the site immediate measures shall be taken to arrange collection and disposal.	When loading there can be some migration across the site on windy days. Weather is checked prior to ordering a trailer, and measures are put in place to prevent blown materials from leaving the site. The site is hoovered following a trailer loading.
		By the end of each working day any loose waste, which may be lying on the site and surrounding area shall be gathered and disposed of in such a way so as to keep the site and surrounding area tidy.	
4.7	Control of Noise	Noise must not be permitted to emanate from the site to cause nuisance or detriment to the surrounding neighbourhood. Noise from the reception, sorting, processing and storage of controlled waste at the recycling compound shall not exceed 45 dB LAeq, 1 hour (free field) measured at any adjacent residential premises.	
5.1	Site Supervision	Whenever operational, the site shall be supervised by persons competent to ensure compliance with Disposal Licence and to the standards set out in the sites working plan.	
5.2	Checks on Incoming Waste	All loads of waste received at the site shall be checked to ensure that the waste types are permitted for disposal and processing at the site.	
5.3	Non-conforming Waste	In the event that non-conforming waste is delivered to the site, the following action will be taken	
		If the non-conforming waste is identified prior to deposit, it shall be turned away from the site;	
		If the non-conforming waste is identified following deposit, it shall be reloaded immediately onto the vehicle making the deposit, or where it is not possible to load the waste onto the vehicle that has made the deposit, it shall be segregated and stored in a designated quarantine area and removed to a suitably licenced site within 5 working days; and	
		The Regulator will be informed forthwith of all cases where non-conforming waste is stored at the site. Department Contact Information – Environmental Protection Unit 01624 685 535	
5.4	Waste Storage	All waste shall be stored in dedicated bays both before and after processing.	Wastes before and after processing are clearly delineated and

			separated within the compound
6.1	Waste and Material Outputs	<p>A record shall be kept of all wastes delivered to and removed from the site. The records shall include the following for details for each consignment.</p> <p>Carrier of waste/material and vehicle registration number; Date and time removed; Weight or volume of waste/material – preferably weight; Waste/material category in accordance with the European Waste Catalogue List of Wastes; and Destination of waste/material and site licence details</p>	annual returns provided
6.2	Record Summary	<p>A Quarterly Licenced Return Form (EPU/WDS/001/V2) shall be submitted to the Regulator within one month of the expiry of each quarter.</p>	
6.3	Site Diary	<p>A site diary shall be maintained in the site office and made available for inspection by any authorized officer of the Department. The diary shall include a record of the following events:</p> <p>Details of construction and engineering works; Emergencies; Incidents of non- conforming waste and action taken; Site inspections and remedial works; and Environmental problems and associated remedial action.</p>	

Appendix B: Water Discharge Results

Appendix C: Evidence

ID + Description	Evidence