

**Audit Report For
Tyre Recovery Association
Responsible Recyclers' Scheme**

Big Atom Ltd

Submitted to:

Brian Rafferty

Big Atom Ltd

Canalside, Oil Sites Road, Ellesmere Port, CH65 4BN

Audit Date:

17 October 2019

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Executive Summary

This Responsible Recycling Scheme (RRS) Audit was carried out on 17 October 2019 at their main working site at Canalside, Oil Sites Road, Ellesmere Port, CH65 4BN. Brian Rafferty was the key auditee.

Big Atom Ltd were very helpful during the audit, presented all of the data for inspection and were very keen to explain and demonstrate the company's working methods. Every month's records were available in a hardcopy format and could be readily extracted from the Company's excellent records system. The Spreadsheets also successfully allowed Big Atom Ltd's records to be interrogated so as to reconcile the waste received and that disposed of from site.

Big Atom Ltd had excellent records fully compliant with their Duty of Care records; in addition a review of all 'downstream' destinations showed that all had the necessary Waste Management Licence or Environmental Permits in place.

Compliance with the requirements of the Environmental Permit was adequate Big Atom Ltd have formalised their inspection record system. Big Atom Ltd's records allow issues to be identified and reported formally so actions are taken well ahead of intervention by the Environment Agency.

The most recent Compliance Assessment Report submitted by the Environment Agency flagged up that the site operator had made some excellent improvements, though there is still some work to do to remove the legacy waste left over from the fire on site when the sit was owned by another operator.

The Operator has a weighbridge so that all loads, both in and out of the site are weighed and all incoming end-of-life tyres have WTN. Once treated the waste is exported complet with Annex 7 forms, though at the time of the audit a WTN was not completed for transport from site to the docks. Before the audit was complete this non-conformance was resolved by printing additional information on the weighbridge tickets. Looking forward special weighbridge tickets will be printed or a stamp purchased to make this easier to facilitate.

Big Atom Ltd undertake size reduction of tyres by shredding, however they do not produce tyre bales for the construction industry, though compliance against PAS107:2012 was assessed during the visit confirming that the End of Waste protocol had been achieved.

The site will be Audited against the Quality Protocol and PAS107 once the new shredder is operational and the outcome will be covered in a separate report.

The overall impression of Big Atom Ltd was one of a neat smooth running operation who are very welcome new members of the Tyre Recovery Association.

Summary of Company's Performance Against Responsible Recycler's Best Practice

Responsible Recycler Scheme Best Practice Criteria
1. Any actions from previous audits are fully completed and signed off by a Senior Manager/Director within a target three month period and a maximum six month period. No recurrence of findings throughout the audit that requires the same action to be recommended.
2. Prompt responses to audit follow up letters with clear and accurate information.
3. Operating in compliance with the definition of Waste Tyres in the Environment Council Paper of October 2003 regarding when tyres become waste.
4. All waste inputs and all waste outputs are transported as waste with Controlled Waste Transfer Notes (CWTNs).
5. CWTNs have all of the relevant information and indicate the actual transactions taking place. Annual CWTNs are in date.
6. Registered waste carriers are used for all waste inputs, transfer and outputs. Demonstrable by having up to date carriers licences on file with an index which is regularly reviewed and is available where wastes are accepted/dispatched.
7. CWTNs or associated 'delivery notes' have the most accurate figure written on for the amount of waste being transferred rather than rough estimates.
8. Operating sites where wastes are managed are appropriately permitted by the EA or SEPA, i.e. Environmental Permit or Exemption
9. Operating sites where wastes are managed are well engineered for drainage and the drainage system can be shut off in the event of a major spillage or fire fighting water containment becoming necessary.
10. Confirmation has been received from the EA as to which Technical Competence qualification will be acceptable depending on the EA's risk rating of the site.
11. Records of site attendance by appropriate Technically Competent Managers comply with EA attendance requirements
12. EA Inspection reports only have positive comments or no comments or have minor criticisms which have been actioned.
13. On contacting the site EA/SEPA officer they state that the company is a good operator and there are no problematic compliance issues
14. Upstream Duty of Care - For collectors this is satisfied by ensuring that all deliveries of waste tyres to the site are covered on a CWTN and the deliverer is a registered carrier of waste or exempt.
15. REACH registration if appropriate, in accordance with advice from the TRA.
16. If operating under this standard PAS 107/108 – Operating in compliance with the standards with internal audit documentation to demonstrate this.
17. All waste inputs and outputs are recorded accurately and summarised using spreadsheets or similar to enable data to be manipulated for EA Waste Returns, RRS Returns and Management Information.
18. Validation of selected figures from EA Returns or RRS returns (from the last 12 months year) at the audit is achieved directly and accurately within a few minutes by reference to the actual CWTNs for the loads which generated the selected figures. This should be achieved by accurate manipulation of data and tidy filing of CWTNs/Delivery notes.
19. All Environmental Permits and Exemptions have limits placed on amounts of waste to be stored. The data manipulation from inputs and outputs along with occasional stock checks should be used to provide a daily stock level to demonstrate compliance with the limit.
20. Documented means of positively recording compliance with the requirements of the Environmental Permit/WML and Management/Working Plan needs to be implemented to prevent the EA having to chase actions.
21. Downstream duty of care information should be collected and filed and maintained up to date to demonstrate that all waste tyre and other waste materials dispatched from the site are compliantly handled by sites, persons or destinations authorised to accept the specific wastes. The information should consist of at least the front pages of any Environmental Permit or Exemption plus the pages which state that waste tyres/or other waste can be accepted. This will usually be defined by the relevant six digit waste code. Best practice can be achieved by carrying out and documenting a duty of care audit visit to the sites and checking that your wastes are being handled compliantly.
22. Where the organisation has ISO 14001, this must be certified by a UKAS accredited certification body with the waste tyre process fully integrated into the Environmental Management System.

Key To Current Status
Not relevant to site activities
Best Practice followed
Some minor attention needed
Issues needing attention

1.0 COMPANY DETAILS

- 1.1 **Name of the Company** **Big Atom Ltd**
- 1.2 **Office Name:** Canalside, Oil Sites Road, Ellesmere Port, CH65 4BN
- 1.3 **Registered Office Address:** 107-109 Great Portland Street, London, W1W 6QG
- 1.4 **VAT Number:** GB 2856 27 364
- 1.5 **Company Registration Number:** 110466802
- 1.6 **TRA Membership Number:** TBC
- 1.7 **Name of the nominated contact person within organisation**
 Company contact person: Brian Rafferty
 Canalside, Oil Sites Road, Ellesmere Port, CH65 4BN
 Telephone: 0151 363 2038
 E-Mail: tohy@bigatom.co
- 1.8 **Name of the Technically Competent person within organisation**
 Company competent persons: Joseph Grant
 / Qualifications: Non-Hazardous Treatment and Transfer
 Level of qualifications meets EA approval: Joe is newly qualified so no Continuing Competence qualifications required
- 1.9 **Description of Company's Principal Activities:**
 Big Atom intend to create a circular economy.

Currently most plastic and rubber waste end up on landfill or are shipped abroad. Plastics that are recycled have limited usage and eventually end up being incinerated or pollute the environment while decomposing over 100's of years.

Big Atom seeks to interrupt this process by providing the technology to close the loop between disposal and manufacturing. Breaking down plastics into raw components and supplying the manufacturer with regained raw materials, allows the creation of brand-new products with little addition of virgin materials, reducing the amount of resources taken from our planet.

Tyre Collection	✓
Tyre Disposal	✓
Retread Manufacture	✗
Tyre Shredding	✓
Tyre Baling	✓
Casing Sales	✗

- 1.10 **Waste Management Licence Records**
 Waste Management Licence Number: *EPR/GB3601GL/V002*
 Description: *A16 : Physical Treatment Facility*
 Information Gathered from Public Register: *No issues or concerns on Public Register at time of audit.*
- 1.11 **Waste Carriers Licence Records**
 Waste Carriers Licence Number: *CBDU254666*
 Carrier/Brokers Licence Description: *Carrier Broker Dealer - Upper Tier*
 Expiry Date: *12 September 2021*
- 1.12 **Controlled Waste Transfer Note (Season Ticket)**
 Controlled Waste Transfer Note: *None*
- 1.13 **Description of Operating Site:**
 A walkover of the site demonstrated that the site had excellent housekeeping with the site very tidy. The drainage of the site was adequate with no ponding of surface water being noted.
- 1.14 **Environmental Management System in Place**
 ISO14001 Certified by Third Party: *Big Atom is currently being assessed by BSI for compliance against ISO 14001:2015*

2.0 REVIEW OF EXISTING RECORDS

The Responsible Recyclers' Scheme sets out a series of records which must be kept to demonstrate compliance. The following paragraphs sets out the requirements, the audit trail followed and whether compliance has been achieved.

2.1 Records of Attendance by Technically Qualified Person:

The Environment Agency as part of its Waste Management Licence conditions will set an attendance requirement for the Technically Qualified Person.

2.1.1 Audit Trail:

Abricon inspected the attendance records for the Technically Competent Members of Staff and can confirm:

'Big Atom' keep a "Daily Diary" which records hours the Technically Competent Person is on site. These logs were inspected and were found to be an adequate record of attendance.

2.1.2 Compliance:

This is in compliance with Environmental Permit (Reference: EPR/GB3601GLV/002).

2.2 EA Inspection Records:

The Environment Agency as part of its routine monitoring undertakes regular inspections or regulated sites. The inspections should not raise any unresolved issues

2.2.1 Audit Trail:

Abricon inspected the Public Records for the site and can confirm:

The need for a review of the Fire Risk Assessment, the permeability of the lagoons and minor amendments to the Working Plan was identified by the Environment Agency.

Refer to Paragraph 2.3.1

2.2.2 Compliance:

The site was inspected during the audit and as far as environmental issues are concerned tidiness, security and drainage it is in line with 'best practice' outlined in the Responsible Recyclers' Scheme.

2.3 Feedback from local EA Inspector:

The Environment Agency as part of its routine monitoring undertakes regular inspections or regulated sites. The inspections should not raise any unresolved issues

2.3.1 Audit Trail:

Abricon examined the most recent Compliance Assessment Reports written by Tammy Finlayson, Joe Wright on 17th July 2019 and Tammy Finlayson, Jack Millington and Sandra Deveraux on 14/08/19. No follow up or further site visits have been undertaken by the Environment Agency.

Date of Inspection	Comments
14 August 2018	<p>Inspecting officers made an arranged visit and were met by Director Toby Moss and Site Manager, Joe Grant.</p> <p>Warrants shown to the Director and Site Manager.</p> <p>The reason for the visit was to check if the actions set in previous CAR form (Report ID 4050911033821 6) had been complied with:</p> <ul style="list-style-type: none"> Ensure the site is being operated in accordance with the Environmental Permit and in line with both the EMS and FPP; Ensure tyres are not stored on site for longer than 48 hours; the height of the stockpile of tyres are below 2 metres and there is a 6 metre separation between the two areas. <p>Prior to the site inspection a meeting took place on site to discuss the previous breach on the CAR form, the recent fire on site, TCM and duty of care notes.</p> <p>The fire on site was started and contained in the site fice and the director advised this was caused by arson. As a preventative measure, the company has now hired security to man the premises when the site is closed.</p> <p>The inspecting officer advised the breach on the previous CAR form ((Report ID 40509110338216) will be increased from a Category 3 to a Category 2, as the breach is based on potential impact; the site is 150m from the Manchester Ship Canal, 200m from the M53 and 150m from a COMAH site.</p> <p>At the time of the inspection on 26th July 2019 there was a large stockpile of waste tyres - the Director advised there was 200 tonnes of tyres. Should the tyres have caught fire this is likely to have resulted in significant impact to the local area.</p> <p>The paperwork was sampled and checked and were in good order. The Site Manager advised he would send the inspecting officer further copies of the duty of care notes if required.</p> <p>The TCM for the site is Joe Grant, who advised he has recently passed his CoTC.RT</p> <p>At the time of inspection the site had reduced the waste stockpile of tyres significantly (see picture 1 and picture 2) to below 2m. The site advised the tyres left will be removed off site within 48 hours. There was clear separation between the two areas, with a fire break.</p> <p>Picture 1 (below) Waste Tyre Stockpile on 26/7/19 Picture 2 (below) Waste Tyre Stockpile on 14/8/19</p>  <p>The Director advised the shredder will be back in operation by the middle of next week. At the time of inspection the site was tidy and organised. Photographs were taken and a Code B served and explained. Please note the timings on the pictures are one hours behind GMT.</p>

2.3.2 Compliance:

This is in compliance with Environmental Permit (Reference: EPR/GB3601GLV/002).

3.0 ACTIONS FROM PREVIOUS AUDITS

The previous Responsible Recyclers' Scheme audit flagged up various "Actions" which need to be resolved. The following paragraphs sets out these Actions, the audit trail followed and whether Action has been closed out.

3.1 2018 Audit - Actions:

No Actions were raised in 2018 as this was the inaugural audit.

3.2 2018 Audit - Observations:

No Observations were raised in 2018 as this was the inaugural audit.

4.0 OUTCOME OF THE 2018 SITE AUDIT

The Responsible Recyclers' Scheme sets out a series of requirements which must be met to demonstrate compliance. The following paragraphs sets out the requirements, the audit trail followed and whether compliance has been achieved..

4.1 Prompt Response:

Abricon audited the Company's Operations on 17 October 2019 and can confirm that the following records were presented in a prompt and concise way:

4.1.1 Audit Trail:

On arrival at site Brian Rafferty presented all of the information needed for the audit in a prompt and efficient manner. This included EA reports, Waste Management Licence, Tonnages of Waste, EA Returns, Waste Carriers Licence and Working Plans.

4.1.2 Compliance:

This is in compliance with the requirements of the Responsible Recycler's Scheme.

4.2 Environmental Compliance – Definition of Waste:

The Responsible Recyclers' Scheme expects members to comply with the latest definition of Waste Tyres

4.2.1 Audit Trail:

Abricon audited the Company's Operations on 17 October 2019 and can confirm that the following records were presented and inspected:

All tyres input and output from the site are transported as waste with CWTN by registered Waste Carrier. The records for April 2019 - September 2019 were inspected.

4.2.2 Compliance:

This is in compliance with the requirements of the Definition of Waste.

4.3 Environmental Compliance – Transporting Waste:

It is a legal requirement that members that transport waste be registered waste carriers. Big Atom Ltd have a Certificate of Registration under the Control of Pollution (Amendment) Act 1989 Licence Reference CBDU254666

This was issued on 12 September 2018 and is due to expire on 12 September 2021.

4.3.1 Audit Trail:

Abricon audited the Company's Operations on 17 October 2019 and can confirm that the following records were presented and

All tyres input and output from the site are transported as waste with CWTN by registered Waste Carrier.

4.3.2 Compliance:

This is in compliance with the requirements of the Responsible Recycler's Scheme.

4.4 Environmental Compliance – Environmental Permit

It is a legal requirement that Big Atom Ltd is compliant with their Environmental Permit (Reference EA/EPR/EP3298VF/A001).

4.4.1 Audit Trail:

Abricon audited the Company's Operations on and can confirm that the following was inspected:

Permitted Waste – Tyres.

Permitted area for deposit - All work confined permitted area

Working Plan - Available for inspection

Site Security – Site secure with fencing around perimeter of site

Site Infrastructure – Impermeable layer, whole of Permitted area under concrete without significant evidence of cracks

Site drainage – No obvious contained drainage system, however ponding following recent rainfall was demonstrated that surface water was not soaking into the ground

Documentary Evidence. WTNs inspected and found fit for purpose

Storage of Waste. Excellent segregation of bales, but there is some legacy waste which will be disposed of once shredder operational

EA inspections of the site raised a few non-conformances on an earlier visit but the proposed improvements were well in hand

4.4.2 Compliance:

This is in compliance with Environmental Permit (Reference: EPR/GB3601GL/V002).

4.5 Environmental Compliance – Duty of Care

It is a legal requirement that members are compliant with the Duty of Care

4.5.1 Audit Trail:

Abricon audited the Company's Operations on 17 October 2019 and can confirm that the following records were presented and inspected:

Upstream

All waste transported by Registered Waste Carriers, a complete set of the Company's records were inspected.

Downstream

All CWTNs inspected waste transported from site went to locations with 'Appropriate Downstream Documentation'.

An audit of April 2019 - September 2019 records demonstrated that all of waste transferred to appropriate locations.

The Company had the necessary records which were inspected to demonstrate that they were an 'appropriate' downstream disposal points.

4.5.2 Compliance:

This is in compliance with the requirements of the Company's Duty of Care.

Upstream

Waste Carriers' Licence Number	Carrier Name	Date of Expiry
CBDU254666	Big Atom Ltd	12/9/2021
CBDU9596	Andy's Tyre Services, Prestatyn	20/4/2020
CBDU 292329	JWT Commercial	6/6/2022
CBDU 111721	Marine Transport Ltd	26/5/2022
CBDU 149642	MacinTyre Transport	24/1/2020

Downstre

Disposal Point	EP reference
Liverpool Port	EPR/BK3506IS
Felixstowe	WEX102545

4.0 OUTCOME OF 2012 SITE AUDIT (CONTINUED)

4.6 Environmental Compliance – REACH

It is a legal requirement that members that use and store chemicals register under the REACH regulations

4.6.1 Audit Trail:

Abricon audited the Company's Operations on 17 October 2019 and can confirm that the Company do not need to register under the REACH Regulations as they do not use use proprietary Chemicals.

4.6.2 Compliance:

This is in compliance with the requirements of the REACH regulations.

4.7 Environmental Compliance – PAS 107/108

Where appropriate the Responsible Recyclers' Scheme expects members to comply with the requirements of PAS107/108.

4.7.1 Audit Trail:

Abricon audited the Company's Operations on 17 October 2019 and Big Atom Ltd have requested a specific audit against PAS 107:2012 and the Quality Protocol. For audit outcome refer to document entitled 'Audit Report For Tyre Recovery Association's Certification Scheme – PAS 107:2012 and Tyre Derived Rubber Materials Quality Protocol' dated 21 May 2015.

4.7.2 Compliance:

Refer to report highlighted in paragraph 4.7.1

5.0 PROCESS COMPLIANCE

The Responsible Recyclers' Scheme expects members to provide data to confirm that the volumes/tonnages of waste tyres reconcile in terms of waste received, waste treated, waste stored and waste disposed off site. This will include confirmation of:

CWTNs have all of the relevant information and indicate actual transactions taking place and:

- CWTNs must have most accurate figures rather the 'rough estimates' of the waste being transferred
- Describe the waste being passed on
- Must contain a European Waste Code
- Must show how waste is contained, eg, loose, in drums, bails etc.
- Must list name of transporter and if they are the producer of waste
- List who the waste is being passed on to
- Must give the address that the waste is transferred
- Must be signed by both parties
- SIC Code of producer of waste
- An acknowledgement of the Waste Hierarchy including a statement that reuse of waste had been considered

All waste inputs and outputs are recorded accurately and summarised on spreadsheets or similar method

The validation of selected figures from EA returns

The quantity of waste stored does not exceed figures on Environmental Permit.

Documented means of recording compliance is available

5.1.1 Audit Trail:

Abricon audited the Company's Operations on 17 October 2019 and can confirm that the following records were presented and inspected:

All records were between April 2019 - September 2019 were inspected.

All records were accurately summarised using Big Atom Ltd spreadsheets which included data on a daily, weekly, monthly, quarterly and annual basis.

Relevant records extracted from spreadsheets made available were validated against the EA returns for the same period with no issues

All CWTNs include information listed in paragraph 5.0 above. 'Spot check' records were inspected:

CWTN Requirement	Present on CWTN?
"Accurate Figures"	<input checked="" type="checkbox"/>
Describe the Waste	<input checked="" type="checkbox"/>
Contain European Waste Cat No	<input checked="" type="checkbox"/>
Describe how confined	<input checked="" type="checkbox"/>
Name of waste transporter	<input checked="" type="checkbox"/>
Indicate if producer of waste	<input checked="" type="checkbox"/>
List who waste is passed on to	<input checked="" type="checkbox"/>
Address of where waste is deposited	<input checked="" type="checkbox"/>
Signed by both parties	<input checked="" type="checkbox"/>
SIC Code of Waste Producer	<input checked="" type="checkbox"/>
Acknowledgement of Waste Hierarchy	<input checked="" type="checkbox"/>

The tonnages of waste tyres received for treatment on site were measured against the restrictions set in the WML. The limit in the Waste Management Licence was 24,999t this was checked against the tonnages were reported to the Environment Agency over the last Quarterly submissions.

Period	Waste Accepted
Q2 Apr - Jun 2019	510 t
Q2 Jul - Sep 2019	<u>790 t</u>
Total for 12 months (approx)	2,600 t

The tonnage treated was considerably less than the Permitted amount therefore Big Atom' are working within the conditions of their Environmental Permit.

5.1.2 Compliance:

The processes audited are in compliance with the requirements of the Responsible Recycler's Scheme.

6.0 ACTIONS AND OBSERVATIONS

The following list of Actions and Observation have been determined during the Audit and must be 'closed-out' within 3 months of the date of the Audit:

6.1 2019 Audit - Actions:
None

6.2 2019 Audit - Observations:
None