



Environment Agency

Waste Audit Report

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

		Ref	120616TOTALA04022025		120616
Operator / Permit holder		TOTAL AGGREGATES LIMITED			
Date		04/02/2025		Time in	Out
Premises	Installation	Waste Permit	Exemption	Producer	X CBD
Site contact (s)		Site Consultant			
Officer's name (s)				Date issued	04/02/2025

Section 1c Assessment Summary – Waste Assessment

This assessment is based on the Duty of Care requirements contained in Section 34 of the Environmental Protection Act 1990 and The Waste (England and Wales) Regulations 2011.

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

Compliance Summary

Compliance check type	Assessed during audit	Non-compliance identified
Waste Assessment	Yes	Yes

Section 2 – Waste Audit 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

INTRODUCTION

The Environment Agency is carrying out a campaign to ensure that soil & stones waste is correctly classified and managed. This report provides information on our findings of a remote desk-based audit of Total Aggregates.

REVIEWED DOCUMENTATION

Total Aggregates have revised their waste assessment documentation following advice and guidance issued in the previous Waste Audit Report (120616TOTALA04122024[REDACTED]).

The following revised documentation was provided over email (28/01/2025).

- Material sampling plan and classification Prepared for Total Aggregates Ltd Slippery Gout Lane Boston facility
- Analytical Test Report (25-00147, issue number 1)

Upon reviewing the supplied documentation, the Environment Agency have the following comments and advice and guidance on the waste classification processes undertaken:

- The testing seems to be for hydrocarbons between C10 - C44 for TPH testing. For the purposes of characterization and classification WM3 requires the assessment of hydrocarbons between C6 - C40 when quantifying TPH.
- The report has addressed the previously identified shortcomings.

GUIDANCE ON WASTE CLASSIFICATION

Mirror coded waste streams

Mirror entries can only be classified as non-hazardous if there is evidence to support the classification. If there is no evidence, the waste must be assumed to have been misdescribed.

It is the duty of the producer of the waste to ensure waste is analysed and assessed in line with the WM3 guidance document. When your site receives the waste, you must request and be provided with the evidence of that assessment.

A waste assessment should include:

- * a sampling plan
- * a waste analysis
- * interpretation of the results, including a hazardous property assessment of the analysis.

An assessment may also include details of the process which produced the waste and, in the case of soils, a site history report to ensure that the analysis has been tailored accordingly.

Please note: Absolute hazardous entries also require an assessment to determine the hazardous properties of the waste, and this information is also needed to complete the consignment note.

Further information

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 organisations (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](#)

If you disagree with this waste assessment report you should raise your concerns to the officer or team which issued the form. This must be done within 14 calendar days of receipt. If the response does not resolve the issue you can request an appeal of the regulatory decision. This request must be made within 28 calendar days of receipt of the response. More details on our regulatory appeals process can be found at <https://www.gov.uk/guidance/appeal-a-regulatory-decision-from-the-environment-agency>.

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.