



Waste Audit Report

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

		Ref	80716				
Operator / Permit holder		RYAN O'DONOVAN HAULAGE LTD					
Date		23/02/2026		Time in	10:30	Out	11:40
Premises	Installation	Waste Permit	Exemption	Producer	CBD	X	
Site contact (s)		Lee Hayhow (TCM)					
Officer's name (s)		John Sullivan		Date issued	12/03/2026		

Section 1b Assessment Summary – Duty of Care

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
Check correct EWC codes	Yes	Yes
Written description of waste including quantity and containment	Yes	No
Time and place of transfer	Yes	No
SIC code of the waste holder	Yes	No
Full details of both transferor and transferee	Yes	No
Producer, importer, carrier authorised to receive	Yes	No
Confirm waste hierarchy has been considered	Yes	No

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

Waste Audit Report (WAR Form)

This report should be read in conjunction with Compliance Assessment Report ID: 80716/0595210.

On Monday 23rd February 2026, Environment Agency officers attended Ryan O'Donovan Haulage Ltd which is located at Crews Hill Transfer station, Kingswood Nursery, Theobalds Park Road, Enfield EN2 9BH (The site) to conduct an unannounced routine compliance inspection against licence reference No EAWML 80716.

Officers arrived on site at 10:30 hrs and met with the sites Technical Competent Manager (TCM).

Officers showed their Personal Authorisations and explained the reason for the visit.

Photographs were taken whilst on site using an Environment Agency issued phone.

A Notice of Powers of Rights (NOP&R) was issued under the Home Office Code of Practice (HOCOP) at 10:36 hrs reference number 114552.

The purpose of the audit was to ensure waste is being correctly described and classified in accordance with technical guidance WM3.

A sample of waste transfer notes and have been reviewed and a waste assessment conducted.

Duty of Care

As a reminder, the Duty of Care legislation, which requires that waste holders must take all reasonable steps to:

- prevent unauthorised or harmful deposit, treatment, or disposal of waste.
- provide an accurate description of the waste when it is transferred to another person.
- ensure that any person you transfer the waste to has the correct authorisation.

Also, all waste transfer notes must:

- identify the waste being transferred using the right EWC code.
- give a description of the waste which includes, the quantity, whether it is loose or in a container and, if in a container, what type
- record the time and place of the transfer.

- provide the SIC code of the waste holder (transferor) using [SIC 2007 codes](#)
- give the name and address of the transferor and the person receiving the waste (transferee) and be signed by them.
- state whether the transferor or the transferee are the producer or importer of the waste, or how they are authorized to receive it (for example, a waste carrier would record that they are a carrier and provide their registration number)
- include confirmation that the transferor of the waste has considered the waste hierarchy when deciding what to do with it.

These requirements are set out in the Waste (England & Wales) Regulations 2011.

Duty of Care Code of Practice provides practical guidance on how to meet your waste duty of care requirements in England and Wales:

<https://www.gov.uk/government/publications/waste-duty-of-care-code-of-practice>

Waste assessment.

A waste assessment has been conducted to ensure that the waste stream 17.05.04 (soil and stones) received and removed from the site is received and removed under the correct EWC code.

A further assessment has been conducted of the trommel fines produced on the site. This is to ensure that the trommel fines have been tested and that they contain no hazardous substances and are removed under the correct EWC code.

Soil and stones

During the visit Waste Transfer Notes were requested for soil and stones produced on site, which are classified (and removed) as LoW code 17 05 04. A waste classification report, a waste assessment, or a partial waste assessment were not available.

During the site inspection waste coded as 17 05 04 was visually assessed. The stockpiles and processed piles of materials appeared to be mixed, containing a mixture of soils, stones, concrete, brick and other inert materials. If the waste is a mixture of soil and stone with other construction materials (such as brick, tile, concrete) it then cannot be described as 17.05.03*/04. The correct code to be used would be 17.09*03/04.

This is a mirror non-hazardous entry in the List of Wastes (LoW). This non-hazardous code can only be used if an assessment of hazardous properties (usually known as a waste assessment) has been carried out which demonstrates that the waste does not display a hazardous property or contain POPs above the specified concentration limits.

For waste classification purposes there is no acceptable level of contamination in single waste streams. If the waste is mixed with other waste, then it is a mixed waste. Contamination must be incidental i.e. the occasional piece and not obviously present throughout the waste.

It is the waste producer's legal responsibility to determine the composition of the waste and assess hazardous properties so that an accurate description is provided when it is transferred to another person. This must include the correct classification code. This is typically outlined in a document

known as a waste classification report and typically includes a sampling plan, lab analysis, and an interpretation of the results, including a hazardous property assessment of the analysis.

The procedure for doing this is described in the waste classification technical guidance document,

WM3 Waste_classification_technical_guidance_WM3.pdf (publishing.service.gov.uk)

Failure to assess hazardous properties means that the composition of this mirror entry waste is not known. In such cases the waste must be classified under the mirror hazardous entry as a precautionary measure.

The waste observed on site shown did not contain sufficient supporting information for it to be classified as LoW 17 05 04 because it was contaminated with a mixture of soils, stones, concrete, brick and other inert materials.

Action 1- Assess the hazardous properties of the waste leaving the site under 17.05.04 using a document known as a waste classification report including a sampling plan, lab analysis, and an interpretation of the results, including a hazardous property assessment of the analysis.

Deadline 19/03/2026

Action 2- Until this waste classification report is completed, the site should remove all soil and stones under the mirror hazardous entry as a precautionary measure.

Deadline 19/03/2026

Trommel fines.

Your site is producing trommel fines coded as 191212. This is a mirror non-hazardous entry in the List of Wastes.

This code can only be used if a waste assessment has been carried out which demonstrates that the waste does not display any hazardous properties. Hazardous trommel fines, or trommel fines which have not been assessed, must be coded as 191211* and consigned as hazardous waste.

Trommel fines are produced on the site, and sampling is taking place to ensure that the waste is correctly classified as either non-hazardous or hazardous.

An Analytical testing report dated 13th January 2026 was provided to the environment agency to evidence that testing of trommel fines produced on site is taking place. The site undertakes regular testing of trommel fines produced on site to ensure that trommel fine contain no hazardous substances and can be removed from site as EWC 19.12.12.

After review, the visiting officer considers that the site is correctly sampling and testing the trommel fines produced on site. The site had sufficient supporting information for the Trommel fines to be classified as EWC 19.12.12. and removed from site.

Further Guidance on how to ensure that the site obtains accurate and representative results can be found in appendix D of the WM3 please see link below.

[Waste classification technical guidance WM3.pdf](#)

Summary of transfer documents reviewed.

Waste transfer notes reviewed

After a review of the waste transfer notes, it appears that all the information has been included on the waste transfer notes reviewed.

Trommel Fines

Permit No: EAWML 80716, EPR/QP3897NB

Date/Time: 20/02/2026

Ticket Number: L28222

Carrier: Ryan O'Donovan Haulage Ltd

Carrier Broker Dealer Licence Number: CDBU81268 Upper tier, expires 30/03/2028

Origin: Ryan O'Donovan Haulage Ltd, Crews Hill Transfer station, Kingswood Nursery, Theobalds Park Road, Enfield EN2 9BH

Destination: Biffa Landfill Solutions Limited, 945 Renwick Road Rail Hub. Licence No EPR/JB3102CA.

EWC Code: 19.12.12

Written Description of waste: (LOI Fines) Qualified Fines Group 1,2 Lqmo 2011.

SIC Code: 43.12

Part E returned: NA

Waste Hierarchy Considered: YES

Comments: None

Soil and stones

Permit No: EAWML 80716, EPR/QP3897NB

Date/Time: 20/02/2026, 12:52

Ticket Number: 1207606099

Carrier: Ryan O'Donovan Haulage Ltd

Carrier Broker Dealer Licence Number: CDBU81268 Upper tier, expires 30/03/2028

Origin: O'Donovan Haulage Ltd, Crews Hill Transfer station, Kingswood Nursery, Theobalds Park Road, Enfield EN2 9BH

Destination: Tarmac Trading Limited. LGL Tyttenhanger Landfill, EPR/BP3893W

EWC Code: 17.05.04.

Written Description of waste: Soils, stones and Clay 30.40to

SIC Code: 38.21

Part E returned: NA

Waste Hierarchy Considered: YES

Comments: None

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.