


CONTROL OF POLLUTION ACT 1974 (PART 1)

THE ENVIRONMENT AGENCY, being the WASTE REGULATION AUTHORITY, in pursuance of the powers conferred by Part 1 of the Control of Pollution Act 1974 (as amended by the Environment Act 1995), HEREBY GRANT A MODIFIED LICENCE for the activities set out below:

Licence Holder	Chemical Recoveries Ltd. Smoke Lane, Avonmouth, BRISTOL BSI I OYT
Nature of Facility	Waste Keeping, Treatment and Recycling Facility
Location of Facility	Rockingham Works Smoke Lane, Avonmouth Grid Ref. ST 527806
Types of Waste	As detailed in Condition 2 of this Licence

This licence is granted subject to the attached conditions. The conditions have been modified to take account of the modification application dated 28 April 1994 together with the Authorisation of the distillation processes at the facility under Part 1 of the Environmental Protection Act 1990 and the creation of the Environment Agency.

This Licence entirely supersedes Licence No. L/BL/P/226A issued on 10th February 1992


.....
Area Manager , North Wessex Area

Dated: 20 November 1996

Environment Agency,
Rivers House,
East Quay
Bridgwater
TA64YS.

Area Manager , North Wessex Area

IT IS IMPORTANT THAT YOU READ ALL THE ATTACHED NOTES

LICENCE CONDITIONS

EXPLANATORY NOTES

This Licence is issued under the provisions of Part 1 of the Control of Pollution Act 1974, by the Environment Agency. On the day following the date of its issue this Licence shall be treated as a Waste Management Licence and dealt with under Part 11 of the Environmental Protection Act 1990.

For the purposes of this Licence, words incorporating the masculine gender shall, where the context so requires, include the feminine gender.

Unless otherwise specified below, the terms used in this Licence shall be construed as having the meaning contained within the Environmental Protection Act 1990 and Regulations made thereunder, as amended by the Environment Act 1995.

This Licence relates solely to those Waste Management activities which do not form part of the "Process" authorised under Part 1 of the Environmental Protection Act 1990 and does not remove any liabilities arising therefrom.

DEFINITIONS

For the purposes of this Licence, the following definitions shall apply.

1. SITE - means the area edged in pink on the site location plan attached to this licence.
2. LICENCE HOLDER - means the person to whom this Licence is granted or subsequently transferred under Section 40 of the Environmental Protection Act 1990.
3. WORKING PLAN - means all the following documents and plans:
 - (a) Information and operational statements contained within the application for authorisation and responses to notices for further information issued under Part 1 of the Environmental Protection Act 1990, except insofar as these relate solely to the recovery of oil and/or solvents by distillation.
 - (b) Operational statements contained within the application for Licence modification dated 28th April 1994 as amended by the letters of clarification from Chemical recoveries Ltd to Avon County Council dated 7th November 1994 and 3rd February 1995.
 - (c) Quality Manuals for oil\water recovery and Kiln Fuel blending insofar as these relate to Disposal Operations.
 - (d) Drawing numbers 1965 and 961/0 showing the layout of the Highly Flammable Solvent Recovery Plant and the Oil and Water Recovery Plant.

or such additional documents and plans, approved in writing by the Environment Agency, which

replace or amend those listed above.

- NB. The Licence Holder may, with the agreement of the Environment Agency modify or add to the Working Plan as necessary to reflect intended changes in the operations at the site. All approved Working Plan documents and plans will be stamped, dated and initialled by an authorised officer of the Environment Agency once they have been approved.
4. WASTE - means Directive Waste as defined in the Waste Management Licensing Regulations 1994.
 5. SPECIAL WASTE - means any Waste subject to the requirements of the Special Waste Regulations 1996.
 6. DISPOSAL OPERATIONS - means the receipt, transfer, processing, treatment or other handling of Waste at the Site.
 7. DEAL WITH - means to carry out disposal operations as defined in Paragraph 6 above. "Dealt With" and "Dealing With" shall be construed accordingly.
 8. AUTHORITY - means any organisation or body, other than the Environment Agency empowered by an Act of Parliament, which has a duty to carry out any enforcement function in connection with the activities of the Site.
 9. DRUM - means a container (other than a tank container) having a capacity greater than 25 litres.
 10. EMERGENCY - means a situation involving Waste where there is significant risk of pollution of the environment or harm to human health.
 11. WASTE STREAM - means a regular arising of Waste having consistent chemical, physical and
 12. OPERATIONAL LIFE - means the period between the commencement and permanent cessation of Disposal Operations at the Site (when all process and storage tanks are empty).
 13. FUGITIVE EMISSIONS - means any uncontrolled releases of fumes or vapours into the atmosphere as a result of Disposal Operations at the Site.
 14. ROLLOVER BUND - means a bund which is capable of being driven over by tankers in order to gain access to loading/unloading areas.
 15. RHYNE - means the body of water bordering the Site as shown on Working Plan drawings 1965 and 961/0.

A. GENERAL CONDITIONS AND LIMITATIONS

1. Except where otherwise directed by the specific conditions of this Licence, no Disposal Operations or Storage of Waste shall take place at the Site except in accordance with the currently approved version of the Working Plan.

Within 3 months of the date of issue of this modified Licence the Licence Holder shall submit to the Environment Agency a revised and updated Working Plan relating solely to those Waste Management activities which do not form part of the process authorised under Part 1 of the Environmental Protection Act 1990.

The revised Working Plan shall include, as a minimum, detailed descriptions of the following matters insofar as they relate to these Waste Management activities:-

- (1) Site infrastructure and drainage;
- (2) Operational procedures;
- (3) Waste acceptance criteria, sampling and analysis jejection procedures;
- (4) Site management;
- (5) Site security;
- (6) Environmental monitoring;
- (7) Record keeping;
- (8) Emergency procedures(including arrangements for containing contaminated water arising from fire fighting activities);
- (9) Waste Storage and transfer arrangements;
- (10) Maintenance and general housekeeping and
- (11) Disposal of residues.

- 2 Without the prior written approval of the Environme Agency, no Waste shall be accepted at the Site other than the following:-

Metal Scrap (maximum 100 tonnes per annum)

Contaminated water

Aliphatic hydrocarbons

Aromatic hydrocarbons

Phenols, analogues and derivatives(Chlorinated phenols and analogues maximum 10 tonnes per annum)

Dichloromethane

Trichloroethylene

Perchloroethylene

Trichloroethane

Trichlorotrifluoroethane

Other halogenated cleaning compounds

Halogenated compounds excluding cleaning compounds(maximum 100 tonnes per annum)

Amines and amides

Nitro compounds

Isocyanates

Other organonitrogen compounds (maximum 20 tonnes per annum)

Organosulphur Compounds (maximum 20 tonnes per annum)
Organophosphorus compounds
Esters
Ethers
Aldehydes and ketones
Alcohols
Phthalates
Epoxy resins (not finished products)
Polyester resins (not finished products)
Phenol -formaldehyde resins (not finished products)
Latex, rubber solutions and suspensions
Synthetic adhesive wastes
Ion-exchange resin wastes
Mineral oils
Vegetable and other oils
Oil/water mixes
Fats/waxes and greases
Pharmaceutical products in retail containers(including Solids)-subject to Environment Agency approval.
Pharmaceutical products in bulk and production containers-subject to Environment Agency approval.
Filter materials
Contaminated rubbish
Nominally empty used containers for decontamination
Industrial effluent treatment sludges
Tank cleaning sludge
Interceptor pit wastes
Printing industry wastes (ink manufacture and use)
Dyestuffs waste
Distillation residues
Tar, pitch, bitumen and asphalts
Paint waste (manufacture and use)
Cellulose Wastes
Soaps
Detergents
Glue wastes

Providing that they do not contain any of the following:

- I. Mercaptans or any other highly malodorous Waste;
- II. Any Waste with a pH less than 2 or greater than 12;
- III. Waste which is spontaneously combustible or fumes on contact with air;
- IV. Waste which reacts violently on contact with water;
- V. Oxidizing Agents or
- VI. PCB's in excess of 50 parts per million.

3. No Waste listed in condition 2 of this Licence shall be accepted at the Site unless it has been shown by prior assessment that the Waste can be:

- (i) safely and effectively treated at the Site without risk of pollution of the environment or harm to human health;
- (ii) used in the treatment of other Waste at the Site;
- (iii) blended with other compatible wastes for kiln fuel production or
- (iv) transferred to a facility within the United Kingdom authorised to treat or dispose of that Waste.

The assessment shall include sampling and testing appropriate to the nature and origin of the Waste and shall be sufficient to identify the major constituents and any significant contaminants.

4. Waste which cannot be treated or blended on the Site shall not be accepted unless arrangements have been made for the onward transfer of the Waste to a suitably authorised facility (condition 3 refers), except where:

- (i) The Environment Agency has given prior written approval to the acceptance of the Waste or
- (ii) The Waste is accepted in an Emergency.

In the event that Waste is accepted in an Emergency, the Environment Agency, North Wessex Area Office shall be notified within one hour by telephone or telephone facsimile between the hours of 0730 and 1830 Mondays to Fridays or by telephone facsimile outside these hours.

5. Except with the prior written approval of the Environment Agency no Waste shall be stored at the Site for longer than:

- (i) 3 months from the date of receipt in the case of drummed Waste
- (ii) 12 months from the date of receipt in the case of Waste in tanks .

6. No more than 25,000 tonnes of Waste shall be Dealt With at the Site per annum.
This condition has been modified – see end of licence for details

B - SITE INFRASTRUCTURE

7. Site identification boards of durable material and finish shall be provided at the entrance to the Site and on the fence along the northern boundary of the Site . These boards shall show the following information and shall be maintained so that the details remain clearly legible, and are up to date and accurate at all times throughout the Operational Life of the Site.

- (a) Name of the Site;
- (b) The name, address and telephone number of the Licence Holder including a 24 hour emergency contact number(the 24 hour Emergency contact number shall also be made known to Avon County Fire Brigade);
- (c) The normal hours for Waste acceptance and
- (d) The address and telephone number of the Environment Agency, North Wessex Area Office.

8. Access to the Site by unauthorised vehicles and/or persons shall be prevented by means of secure fencing around the perimeter of the Site, lockable gates at the entrance to the Site and the other security measures as detailed in the Working Plan.

9. Access gates and perimeter fencing shall be maintained in an effective condition throughout the Operational Life of the Site.

Access gates shall be kept locked at all times except when Waste is being delivered to the Site or access to the Site is required for operational, maintenance or Emergency reasons.

10. A Site control office and laboratory shall be provided as shown on the Working Plan.

11. The Site control office and laboratory shall be constructed and maintained throughout the Operational Life of the Site to a standard sufficient to ensure that Site personnel, equipment and all documents and records relating to this Licence are adequately protected from adverse weather conditions.

12. All operational areas of the Site shall continue to be surfaced with a hard, durable, impermeable material capable of taking loaded vehicles without deformation.

13. No Waste or recovered (or partially treated) oil shall be held in any tank unless the tank is contained within a bunded (or otherwise spill protected) area capable of containing any spillages. Any valves, pipe-work connections and gauges shall be located within the bunded/ protected area.

Protective bunding shall be designed to contain 110% of the effective volume of the largest tank contained within it.

The floor and side walls of bunded areas shall be sealed to prevent any seepage of Waste through the walls or into the underlying ground.

14. There shall be no flexible pipe connections to any tank outside bunded areas with the exception of temporary hose connections to tankers

15. Tanker loading/unloading areas identified in the Working Plan shall be protected by bunding including a Rollover Bund at the entry to facilitate vehicle movements.

16. All Waste storage tanks shall be clearly labelled in order to unambiguously identify the contents of each tank.

17. Oil interceptors or suitable alternative oil removal devices shall be provided and maintained in effective working order to ensure that any surface water returned to the Rhyne from operational areas of the Site is uncontaminated by oil.

18. All Waste storage/blending tanks shall be operated so as to prevent overfilling .

19. Suitable barriers and warning signs shall be erected in order to prevent:

- (i) accidental ingress of vehicles or persons into any tank or container and
- (ii) accidental damage to any tanks pipelines or valves by any vehicle attending the Site.

20. A plan of the Site clearly identifying the location of each Waste storage and treatment area shall be displayed so as to be clearly visible at the entrance to the Site.

This plan shall be of durable material and finish and shall be displayed adjacent to the Site identification board (condition 7 refers). The plan shall be maintained throughout the Operational Life of the Site in order to ensure that it remains clearly legible at all times and it shall be updated as necessary and without delay to reflect any changes to the Site layout.

21. Each separately identifiable Waste transfer and treatment area shall be clearly and accurately identified on the Site by means of a sign of durable material and finish, displayed adjacent to that area. The sign shall be maintained throughout the Operational Life of the Site in order to ensure that it remains clearly visible at all times.

22. Site entry and exit routes shall be clearly identified by means of suitable signs and/or road markings. Free and unobstructed access to the Site shall be maintained for Emergency service vehicles.

C - RECORD KEEPING AND REPORTING REQUIREMENTS

23. The following details shall be recorded for each consignment of Waste entering or leaving the Site:

- (a) Origin and detailed description of the Waste together with any reference numbers and/or codes allotted to the Waste (as described in the Working Plan);
- (b) Quantity of Waste;
- (c) Waste carrier and vehicle registration
- (d) Method of dealing with the Waste (eg. blending onward transfer, oil/water separation etc.);
- (e) Sampling and testing results and
- (f) Any load rejected from the Site (including reasons for rejection and details of further action taken).

Where the Waste is received as a mixed load, accurate details of each separately identifiable item of Waste within the load shall be recorded.

The records shall be sufficiently detailed to enable the origin (and fate) of any particular item and/or load of Waste to be determined.

24. A record shall be kept of any Emergency at the Site. (including any fire or major spillage [in excess of 20 litres] of waste)

25. Records required by Section 34 of the Environmental Protection Act 1990 and the Special Waste Regulations 1996(or successor legislation),together with records required by conditions 23 and 24 above, shall be kept in the Site Control Office(or such alternative location agreed in writing by the Environment Agency)for the duration of this Licence.

26. These records shall be made available for inspection by any authorised officer of the Environment Agency upon request at all reasonable times.

27. Annual summaries of the records required by condition 23 [(a),(b)and (d)] of this Licence shall be prepared and submitted to the Environment Agency by 30th April each year.

These summaries shall be for the period up to and including 31st March each year.

28. A copy of any notice or instruction from any Authority, which in any way relates to the use of the Site, shall be sent to the Environment Agency within seven days of the receipt of such notice or instruction.

29. The Licence Holder shall provide the Environment Agency with an up to date record of those individuals constituting the technically competent management for the Site and any other persons having responsibilities in the following areas namely:

- (a) Ensuring compliance with the conditions of this Licence;
- (b) Maintaining day to day control of operations;
- (c) Maintaining records as required by conditions 23 to 25 and 45 of this licence;
- (d) Sampling and analysis of Waste and Rhyne water;
- (e) Authorising acceptance or rejection of Waste;
- (f) Environmental monitoring;
- (g) Attending to Emergency situations both within and outside normal working hours and
- (h) Site security.

The details provided in the record shall include name, qualifications, WAMITAB

Any changes to the record shall be immediately notified to the Environment Agency so that the Agency has a complete, up to date, record.

30. All persons referred to in condition 29 above shall submit to the Environment Agency a signed statement to the effect that they have read and understood the conditions of this modified Licence.

31. Any cessation of Disposal Operations for a period exceeding three months, shall be notified in writing to the Environment Agency. This shall not apply where the Licence has been suspended by the Environment Agency pursuant to Section 38 of the Environmental Protection Act 1990.

32. At least 14 days written notice shall be given to the Environment Agency of the date on which Disposal Operations are to recommence in the event of a temporary cessation in excess of three months

D - CONTROL MEASURES (GENERAL)

33. No Waste shall be dealt with at the Site unless the level of staffing and supervision is sufficient to ensure that Waste is dealt with safely and in accordance with the conditions of this Licence.

At least two persons shall be on Site whenever Disposal Operations are taking place.

Whenever Waste is being stored even in the event that no Disposal Operations are taking place, a daily inspection shall be undertaken of the entire Site and a record shall be kept of all such inspections.

This condition has been modified – see end of licence for details

34. Transfer of Waste into storage and/or treatment vessels shall be carefully controlled in accordance with the Working Plan in order to minimize Fugitive Emissions. This shall include the use of vacuum for transfers wherever possible.

35. Measures shall be taken in accordance with the Working Plan to prevent spillages of Waste during Disposal Operations.

36. Any spillages of Waste shall be contained, absorbed using suitable absorbent materials or otherwise dealt with in accordance with the Working Plan, in order to ensure that the spilt waste does not drain off-Site. In the event that Waste from a spillage drains into any of the below ground sumps on the Site then the contents of that sump shall be transferred forthwith into an appropriate above ground tank.

37. All Waste delivered to the facility shall be subjected to sufficient inspection and testing to ensure that it complies with the agreed specification for that particular Waste or Waste Stream.

Any Waste which has not been fully assessed prior to its delivery to the Site shall be subjected to sufficient sampling and analysis upon arrival to determine its acceptability under the terms of this Licence.

38. Any Waste falling outside the agreed specification or otherwise proving to be unacceptable shall be dealt with in accordance with the Working Plan.

In the event that Waste is rejected from the Site, the Environment Agency, North Wessex Area Office shall be notified within one hour by telephone or telephone facsimile between the hours of 0730 and 1830 Mondays to Fridays or by telephone facsimile outside these hours.

39. Noise emissions at the Site shall be minimized by the regular maintenance (in accordance with the manufacturers recommendations) and correct use of plant and equipment.

E - FIRE PRECAUTIONS AND EMERGENCY PROCEDURES

40. An up to date copy of the Emergency Plan detailing the procedures to be adopted in the event of a major spillage, fire or other Emergency at the Site shall be submitted to the

Environment Agency and Avon Fire Brigade within one month of the issuing of this modified licence.

The Licence Holder shall ensure that the procedures laid down in the Emergency Plan are made known to all Site personnel.

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41. Fire fighting equipment shall be provided at the Site as detailed in the Working Plan. This equipment shall be inspected and maintained in accordance with the manufacturers instructions in order to ensure that it is in good working order at all times

42. Smoking shall be prohibited in operational areas of the Site and "no smoking" signs of durable material and finish shall be displayed prominently at appropriate locations.

43. With the exception of any recovered oil used for process heating , no Waste shall be burnt at the Site. Any outbreak of fire shall be regarded as an Emergency, the FireBrigade shall be called and the Environment Agency shall be notified immediately thereafter.

In the event of a fire ,all Waste transfer and treatment shall cease unless otherwise directed by the fire officer in charge of fire fighting operations.

44. No Disposal Operations shall take place unless measures are taken in accordance with the Working Plan to prevent accidental ignition of flammable vapours or liquids by electrical discharges.

F -ENVIRONMENTAL MONITORING

45. Unless otherwise agreed in writing by the Environment Agency water samples shall be taken at least once per month from the Rhyne bordering the Site and analysed as a minimum for the following parameters

pH

Conductivity

Hydrocarbon Oils(visible test)

COD

Records of the results obtained shall be kept in the Site Control Office, and quarterly summaries of the results(together with a plan showing the sampling locations) shall be forwarded to the Environment Agency.

In the event that the monitoring programme reveals that drainage from the Site is giving rise to significant deterioration in water quality within the Rhyne or if the Rhyne gives rise to any odour problems,then action shall be taken to remedy the situation to the written satisfaction of the Environment Agency.

G - SITE OPERATIONS (GENERAL

46. The Site shall be kept clean and tidy at all times. In particular regular sweeping of internal roadways and operational areas shall be carried out.

47. All vehicles shall be inspected and cleaned as necessary, before leaving the Site in order to ensure that no extraneous Waste is carried out onto the public highway.

48. Water accumulating in any of the bunded areas and underground sumps detailed in the Working Plan shall be regularly pumped out and removed to an appropriately authorised facility, or recycled within the Site, in order to ensure that there is always sufficient capacity to contain 110% of the effective volume of the largest tank within the bunded area.

49. No Disposal Operations shall take place unless there is sufficient illumination to ensure that Disposal Operations can take place without endangering any persons or vehicles attending the Site.

50. No Wastes shall be blended or mixed unless representative samples of each Waste have been adequately tested in order to ensure the compatibility of the proposed blend.

51. Authorised Officers of the Environment Agency shall be afforded access to all areas of the Site at all reasonable times for any or all of the following purposes:

- (a) Inspecting the Site to ensure compliance with the Licence conditions;
- (b) Sampling of Wastes and residues from treatment processes;
- (c) Environmental monitoring and
- (d) Checking records.

52. All plant and equipment and site infrastructure shall be maintained in good order and repair to ensure that it remains fit for its intended purpose.

H - SPECIFIC CONDITIONS FOR DRUMMED WASTES

53. Drummed Wastes awaiting sampling and analysis, and other packaged Wastes awaiting transfer off Site, shall be stored only in the designated drum reception area as detailed in the Working Plan. This area shall be bunded and drained to an underground sump as detailed in The Working Plan. The quantity of drummed Waste dealt with shall not at any time exceed the operational and storage capacity of the Site.

54. Drums shall be stacked no more than three high and shall be stored in such a manner that they are readily accessible and can be inspected for leakage and/or damage.

55. Measures shall be taken to immediately repackage any seriously damaged or leaking Drums which arrive at the Site and to prevent a recurrence.

56. Any Drums found on subsequent inspection to be leaking shall be emptied into another suitable Drum or into the appropriate storage/process tank.

57. Each Drum shall be clearly and unambiguously identifiable in order to enable its origin, contents and date of arrival at the Site to be readily determined.

58. Any drummed Waste found on subsequent inspection and testing to be unacceptable under the terms of this Licence shall immediately be labelled as such and either returned to the Waste producer or sent to an appropriately authorised facility within two weeks of its receipt at the Site.

59. Measures shall be taken in accordance with the Working Plan to minimize Fugitive Emissions during Drum handling operations. Openings of Drums containing significant quantities of volatile liquid Waste shall be sealed except during sampling and/or transfer operations.

Within 6 Months of the date of issue of this modified Licence a report shall be submitted to the Environment Agency which identifies the total releases to air from the Drum handling operations together with proposals to reduce these emissions within a specified timescale. Any such proposals shall also include measures to control the emissions of dust and vapours from the mixing of pulverised fuel ash and/or cement kiln dust with Drum residues.

60. The terms of this Licence shall be made known to any person who is given responsibility for any aspect of the operation, management, or control of the Site and a copy of the Licence and the Working Plan shall be displayed prominently within the Site Control Office.

CONDITIONS END



**ENVIRONMENTAL PROTECTION ACT 1990
SECTION 37(1)(b)
WASTE MANAGEMENT LICENCE
NOTICE OF MODIFICATION**

**LICENCE REF NO:-
L/BL/P/226B**

**FACILITY TYPE:
WASTE KEEPING, TREATMENT AND
RECYCLING FACILITY.**

**LICENCE HOLDER:
CHEMICAL RECOVERIES LTD.
AVONMOUTH WORKS
SMOKE LANE
AVONMOUTH
BRISTOL
BSI 1 OYA**

**LICENSED FACILITY
ROCKINGHAM WORKS
SMOKE LANE
AVONMOUTH
BRISTOL
GRID REF ST 527806**

WHEREAS on the 15th August 1991 Avon County Council issued a Disposal Licence in pursuance of their powers under Part 1 of the Control of Pollution Act 1974 for the above named facility

AND WHEREAS on 10th February 1992 the conditions of the said licence were modified

AND WHEREAS on the 1st May 1994 the said licence fell to be treated as a waste management licence

AND WHEREAS on the 1st April 1996 the powers and duties of waste regulation authorities in England and Wales transferred to the Agency by virtue of section 2 of the Environment Act 1995

AND WHEREAS on 20th November 1996 the conditions of the said licence were modified

AND WHEREAS the Agency considers a modification of the said licence to be desirable and is unlikely to require an unreasonable expense on the part of the licence holder.

NOTICE IS HEREBY GIVEN that the Agency modifies the conditions of the said licence as detailed in Schedule A

Signed
Area Manager - North Wessex Area

Name- C.J. Birks

Date *30 September 1997*
Such Modification to take effect on 3 October 1997 at 0001 hours.

**YOUR ATTENTION IS DRAWN TO THE RIGHTS OF APPEAL ATTACHED TO THIS
NOTICE**

Schedule A

Condition 6 - amended to read as follows:-

No more than 50,000 tonnes of Waste shall be Dealt With at the Site per annum.

Condition 33 - amended to read as follows:-

No Waste shall be dealt with at the Site unless the level of staffing and supervision is sufficient to ensure that Waste is dealt with safely and in accordance with the conditions of this Licence.

No Disposal Operations shall take place with only one person present on the site unless and until a lone working procedure approved in writing by the Environment Agency has been implemented.

Whenever Waste is being stored even in the event that no Disposal Operations are taking place, a daily inspection shall be undertaken of the entire Site and a record shall be kept of all such inspections.

