	EPR Compliance Assessment Report	Report ID: 100525/0241832
This form will report compliance with your permit as determined by an NRW officer		
Site	Cowbridge Compost Ltd	Permit Ref 100525
Operator/ Permit holder	Cowbridge Compost Ltd	
Date	10/06/2015	Time in 09:00 Out 12:00
What parts of the permit were assessed	None - Audit Update	
Assessment	Procedure review	EPR Activity: Installation Waste Op X Water Discharge
Recipient's name/position	Mike Hallet / TCM	
Officer's name	Adam Ward, Chris Thomas	Date issued 16/06/2015

Section 1 - Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS scores can be consolidated or suspended, where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit Conditions and Compliance Summary			Condition(s) breached
a) Permitted activities	1. Specified by permit	A	
b) Infrastructure	1. Engineering for prevention & control of pollution	N	
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	N	
	4. Containment of stored materials	N	
	5. Plant and equipment	N	
c) General management	1. Staff competency/ training	N	
	2. Management system & operating procedures	N	
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	N	
d) Incident management	1. Site security	N	
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	N	
	2. Land & Groundwater	N	
	3. Surface water	N	
	4. Sewer	N	
	5. Waste	N	
f) Amenity	1. Odour	N	
	2. Noise	N	
	3. Dust/fibres/particulates	N	
	4. Pests, birds & scavengers	N	
	5. Deposits on road	N	
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	N	
	2. Records of activity, site diary, journal & events	N	
	3. Maintenance records	N	
	4. Reporting & notification	N	
h) Resource efficiency	1. Efficient use of raw materials	NA	
	2. Energy	NA	

KEY: C1, C2, C3, C4 = CCS breach category (* suspended scores are marked with an asterisk),
A = Assessed (no evidence of non-compliance), N = Not assessed, NA = Not Applicable, O = Ongoing non-compliance – not scored

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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If the Total No Breaches is greater than zero, then please see Section 3 for details of our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- the part(s) of the permit that were assessed (e.g. maintenance, training, combustion plant, etc)
- where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- any non-compliances identified
- any non-compliances with directly applicable legislation
- details of any multiple non-compliances
- information on the compliance score accrued inc. details of suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

This report should be clear, comprehensive, unambiguous and normally completed within 14 days of an assessment.

Audit Plan – Update on Progress (See audit CAR Ref: 150318).

Cowbridge Compost Inspection with Chris Thomas – 3rd June 2015

As part of the ongoing internal investigation into the regulation of Cowbridge Compost Ltd, Environment Officer Chris Thomas from our South West Ops area attended site with Adam Ward to conduct an informal assessment. A summary of the key findings of Chris's inspection report are as follows;

Pre-treatment Storage

- Potential issues with green waste storage – significant volumes were on site which had started to biodegrade. The manner in which the green waste is currently stored is likely to lead to anaerobic conditions and therefore cause mal-odorous emissions from site.

In Vessel Composting

- Feedstock issue – currently struggling to meet desired food to green waste ratio of 1:4 due to capacity issue. Currently using ratio of 1:2, occasionally 1:3.
- Ineffective monitoring of moisture and oxygen levels – noted the purchase of the 'Compost Manager', but stated this had not been taken out of its packaging as yet.
- Noted improvements of IVC infrastructure, including Bio-filter.

Open Windrow Composting

- Incorrect shape and size of compost batches – site not actually forming windrows, but creating large dense blocks of compost which prevent effective monitoring and are likely causing anaerobic conditions within the compost batches.

Please see Chris's Recommendations and Summary in the letter attached for further info.

Cowbridge Compost Visit 10th June 2015 – Meeting with AHVLA and Audit Update

Audit Plan Recommendations and Updates;

1. Update Environment Management System (EMS) and Odour Management Plan (OMP) to accurately reflect on-site practices and to bring them in line with guidance from WRAP and The Composting Association.
 - a. I received the updated EMS and OMP on 11/06/2015. I will review these in due course.
2. Improve temperature, moisture and oxygen levels in IVC batches
 - a. You have begun to add more oversize (bulking materials) to improve porosity. This should therefore increase oxygenation and speed composting process so that batches are less active/odorous when they enter Open Windrow Composting (OWC). The new 'Compost Manager' will be able to take accurate recordings to determine whether moisture and oxygen levels have improved as a result.
3. Improve feedstock management (food to green waste ratio of 1:3/4).
 - a. You have attempted to increase green to food waste ratios to achieve desired Carbon to Nitrogen (C:N) ratios, but have had difficulty in achieving this due to the capacity of the IVC bunkers and the potential for a backlog of food waste. You have been using ratios of 1:2, occasionally 1:3.

I met with the AHVLA Veterinary officers on site to discuss the flexibility the site has to be able to micromanage compost batches more effectively within the IVC, without jeopardising compliance with the Animal Bi-Product Regulations. We have come to an agreement for the site to start experimenting by adding extra shredded green waste to batches that have reduced in volume via dewatering/composting. This will improve C:N ratios toward the latter stages of the IVC process, thus making conditions more favourable by the time the batches enter OWC.

4. Implement effective monitoring and maintenance of IVC bio-filter
 - a. The bio-filter media has recently been replaced to ensure there is reduced compaction and biodegradation. Old was material mixed with newer material to maintain desired microbiology. The 'Compost Manager' will be used to monitor temperature and moisture levels to achieve compliance with EMS and OMP.
5. Conduct effective monitoring of Open Windrows
 - a. The site has purchased the 'Compost Manager' equipment to be able to effectively monitor temperature, oxygen and moisture levels. The site has had difficulty operating the equipment thus far, but will be receiving training from the supplier in due course.
6. Utilise the Davis Vantage Weather System more effectively
 - a. The operator is now contacted simultaneously to the Duty Officer when ICC receives an odour complaint. The site has been conducting their own on-site inspection which consists of recording wind speed and direction, as well as any on site activities. The site has also purchased wind socks so that activities such as tromelling can be ceased if wind direction changes.

Response to Chris Thomas Investigation

1. The green waste (pre-treated) stockpile is not currently in breach of the permit in terms of storage limits. However, we recognise the potential issues the *seasonal* backlog may incur. As mentioned above, the site will begin incorporating extra shredded green waste into the latter stages of the IVC process as well in existing Open Windrows. This should go some way to reducing the volume of the green waste stockpile so that conditions can be better managed (e.g. allowing more aeration to prevent anaerobic conditions during pre-treatment storage).
2. Windrow size and shape has now been altered. Extra room has been created on the impermeable surface so that all batches leaving the IVC can be placed into long A-shaped windrows which should allow them to quickly achieve desired conditions. Existing windrows have also been reduced in size and elongated, although this material may still be highly active and may take some weeks to clear the process.
3. As mentioned above, the 'Compost Manger' is purchased but is not currently in full use until the operator has received the training planned.
4. To date, I have issued 4 Compliance Assessment Report (CAR) forms for our response to odour complaints/assessments. I have taken the approach to breach the site against permit conditions relating to their management system and OMP when a mal-odour is confirmed by the attending officer. This will continue until **ALL** recommendations have been fully implemented. I have scored 1 breach per calendar month against the amenity (odour) condition, which is in line with the latest CCS scoring guidance. The rest are scored 'O' for ongoing non-compliance.


Summary

Although the internal investigation has not yet concluded, it has been suggested that that we should implement a Site Improvement Plan so that we can provide 'completion dates' for each of the recommendations provided in the recent audit, as well as for some of the findings outlined by Chris Thomas. I will therefore attend site to discuss the implementation of an SIP in due course.

In the meantime, any mal-odours detected will be linked to the failure to implement any of the recommendations provided in the audit or via Chris's report. If the site continues to cause odours following the completion of the SIP, officers will begin conducting technical assessments of the composting process in response to odour complaints, where the monitoring of critical limits and the implementation of corrective actions will be a focus.

If you have any questions regarding this CAR form, please do not hesitate to contact Adam Ward on 03000 653149 or via email: adam.ward@naturalresourceswales.gov.uk



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Section 3- Enforcement Response	Only one of the boxes below should be ticked
You must take immediate action to rectify any non-compliance and prevent repetition. Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.	
Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.	<input type="checkbox"/>
In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.	<input type="checkbox"/>
We will now consider what enforcement action is appropriate and notify you, referencing this form.	<input type="checkbox"/>

Section 4- Action(s)			
Where non-compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.			
Criteria Ref.	CCS Category	Action Required/Advised	Due Date
See Section 1 above			

Section 5 - Compliance notes for the Operator

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
- require you to review your procedures or management system
- change some of the conditions of your permit
- decide to undertake a full review of your permit

Any breach of a permit condition 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 can include the issue of a formal caution, prosecution, the service of a notice and or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- ensure you comply with other legislative provisions which may apply.

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance which could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General Information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfill its regulatory and monitoring functions and to maintain the relevant [public register\(s\)](#). The NRW 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
- providing public register information to enquirers
- 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 NRW 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.

Disclosure of information

The NRW will provide a copy of this report to the [public register\(s\)](#). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within twenty working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

[Customer charter](#)

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with the officer's line managers. If you wish to raise your dispute further through our official [Complaints](#) and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00–18.00) and ask for the [Customer Contact](#) team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the [Public Services Ombudsman for Wales](#). For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.