	EPR Compliance Assessment Report	Report ID: 100525/0254307
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	10/12/2015	Time in 14:00 Out 16:00
What parts of the permit were assessed	All	
Assessment	Site Inspection	EPR Activity: Installation Waste Op X Water Discharge
Recipient's name/position	Mike Hallet (COTC) / John Homfray	
Officer's name	Adam Ward, Eleanor Davies	Date issued 15/12/2015

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	A	
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	A	
	4. Containment of stored materials	A	
	5. Plant and equipment	A	
c) General management	1. Staff competency/ training	N	
	2. Management system & operating procedures	N	
	3. Materials acceptance	A	
	4. Storage handling, labelling, segregation	A	
d) Incident management	1. Site security	A	
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	A	
	2. Land & Groundwater	A	
	3. Surface water	A	
	4. Sewer	N	
	5. Waste	A	
f) Amenity	1. Odour	A	
	2. Noise	A	
	3. Dust/fibres/particulates	A	
	4. Pests, birds & scavengers	A	
	5. Deposits on road	A	
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	A	
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
-----------------------------	---	--	---

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.

Summary

This inspection was conducted as part of the regular compliance inspections required throughout the year. It was also an opportunity to show new Senior Officer Eleanor Davies around site and to assess compliance with the agreed Site Improvement Plan – Ref: 150812.

Site Improvement Plan

This year you have made a concerted effort to make positive changes to your operation to reduce the risk of mal-odours emanating from the facility. These have included raft of improvement measures provided by the audit that was implemented earlier and alter formalised via the above site improvement plan. These include;

- Increasing the food to green waste ratio to 1:3/4
- Using the 'Compost Manager' to accurately monitor and record Temperature. Oxygen and Moisture conditions of IVC batches and Open Windrows
- Maintaining the desired long, A-shaped windrows to allow aeration and accurate monitoring
- In response to odour complaints, implement new odour assessment procedure by providing key data such as site activities and weather conditions to NRW

You have therefore successfully complied with the site improvement plan and all relevant breaches will remain suspended. Thank you for continued cooperation throughout this period.

Operational Changes

It is extremely positive to see that you have gone above and beyond the specified site improvement plan by implementing further improvements to your operation in recent weeks. The green waste storage area has previously been highlighted as an area concern. As the green waste was being stored in silage clamp, material deposited at the back of the clamps was inaccessible and was becoming anaerobic. You have therefore made significant improvements to the operation by storing the green waste in cattle sheds, where the stockpiles can be accessed at both ends are undercover.

Further, the all compost batches that used to be stored on the maturation pads and cattle sheds have been moved to the silage clamp into long A-shaped windrows. This activity area is much further away from sensitive receptors and therefore, it is hoped this will reduce the amount of odour complaints even further. Credit to major improvements you have implemented on site. NRW has not received an odour complaint in almost 8 weeks for the second time this year.


Please ensure your management system is updated to explain and demonstrate the change in operations so that the necessary compliance assessments can be made in future.

Other Comments

Having assess the IVC building, it was noted that the new hinged doors to the food and green waste reception area were damaged, making it difficult to close fully to achieve negative air pressure inside the building. You had explained that this had been recorded and that a maintenance engineer was due imminently. Please provide us with an update when the work has been completed.

It was also noted that the steam being released from the bio-filter was concentrated at one section of the bio-filter media, suggesting odorous emissions are not spreading uniformly through the filter for optimum treatment and odour reduction. We recommend you determine the cause of this apparent 'blockage' of air. We discussed the option of building up the height of the bio-filter media in the area with excess emissions to provide further treatment capacity. Please provide NRW with updates on your maintenance proposal in due course.

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

	EPR Compliance Assessment Report	Report ID: 100525/0254307
This form will report compliance with your permit as determined by an NRW officer		
Site	Cowbridge Compost Ltd	Permit 100525
Operator/ Permit	Cowbridge Compost Ltd	Date 10/12/2015

Section 3- Enforcement Response	Only one of the boxes below should be ticked
<p>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.</p>	
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.