

	EPR Compliance Assessment Report	Report ID: 30276/0254004			
This form will report compliance with your permit as determined by an NRW officer					
Site	Gellia'r-gwellt Uchaf Transfer & Composting Station		Permit Ref	30276	
Operator/ Permit holder	Bryn Recycling Ltd				
Date	02/12/2015		Time in	11:00	Out 13:00
What parts of the permit were assessed	Infrastructure and Management				
Assessment	Site Inspection	EPR Activity:	Installation	Waste Op	X Water Discharge
Recipient's name/position	Alun Price				
Officer's name	Adam Ward		Date issued	10/12/2015	

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	N			
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	C3	2.3.1.		
	3. Materials acceptance	A			
	4. Storage handling, labelling, segregation	C3	2.1.1.		
d) Incident management	1. Site security	N			
	2. Accident, emergency & incident planning	N			
e) Emissions	1. Air	A			
	2. Land & Groundwater	N			
	3. Surface water	N			
	4. Sewer	N			
	5. Waste	A			
f) Amenity	1. Odour	A			
	2. Noise	A			
	3. Dust/fibres/particulates	N			
	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	N			
h) Resource efficiency	1. Efficient use of raw materials	N			
	2. Energy	N			
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	2	Total compliance score (see section 5 for scoring scheme)	8
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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.

Gelli a'r Gwellt Uchaf Farm Waste Transfer Station

Summary

The main purpose of this visit was to discuss the proposal for an inert landfill at a section of the existing quarry. Members of NRW's Geosciences and Permitting department attended for a detailed discussion regarding issues with the current permit application and to determine what additional information was required. Regulatory Officers also conducted a basic site inspection of the Quarry (compost storage) and HCI Waste Transfer Station areas.

Quarry – Compost Storage

There appears to be large stockpiles of compost that have not been screened and are heavily contaminated with plastics. There is also a large compost stockpile that appears to be overgrown with vegetation. With the Bryn Power AD Plant near completion, we understand that the volume of compost entering the quarry will significantly reduce. We will therefore wait until the New Year (2016) to conduct a full audit to check compliance against storage conditions specified by the permit.

Transfer Station

The transfer station benefits from a large building which appears to be effectively preventing ingress of any rain water and therefore, contaminated run-off from site is kept to a minimum. However, there are areas of concern to the rear of the building, as stockpiles of transfer stations fines are stored outside in areas which do not benefit from an impermeable surface a sealed drainage system. This area is yet to be fully concreted and the boundary of the site does not benefit from a suitable bund. You have recognised this and have explained that you intend to complete infrastructure works in due course. Please contact your regulating officer to discuss appropriate timescales for completion. In the meantime, we will continue to score a minor breach of the permit (see compliance section below).

It was noted that the mixed waste entering the transfer station from local Civic Amenity sites was heavily contaminated and there were a number of recyclable materials within the mixed waste. We recommend discussing this issue with the local authority to improve the quality of the recycle.

You are currently storing large of volumes of waste wood chip on an impermeable surface near the IVC building. You are also shredding this material in to different grades. We understand this is a temporary measure while you deal with the backlog of wood waste on site but in the meantime, please ensure you are not causing dust/fibre/particulate issues when shredding.

In the New Year we intend to complete a paperwork audit for the transfer station to assess all incoming and outgoing waste streams. We will ensure that you are informed in advance of the audit so that the relevant paperwork can be prepared.

Compliance

C4) Storage, Handling, Labelling and Segregation

Permit Condition 2.1.1 – refers to Schedule 1, Table 1.1, which states “Biodegradable wastes shall be stored on an impermeable surface with sealed drainage. All other wastes shall also be stored on an impermeable surface with drainage to an interceptor.” Waste transfer stations fines (19 12 12) are currently being stored on an area which does not benefit from a complete impermeable surface. **You have therefore been scored a Category 3 breach against this permit condition.** The root cause of this breach is as follows;

C2) Management – Management Systems & Operating Procedures

Permit Condition 2.3.1. – referring to table 1.2 of the permit, requires compliance with procedures specified in the environmental management system, where Section 5.3 states that all wastes will be stored on a bunded, impermeable surface which drains to a sealed system or an interceptor. **As explained above, you have been scored a Category 3 breach for storing transfer station fines (19 12 12) in an area which has an incomplete impermeable surface/sealed system.**

Action: We understand that the risks are relatively low and that there a number of larger infrastructure project currently ongoing at Gelliargwellt Uchaf Farm. For the time being, please discuss proposed timescales for the completion of the impermeable surface with your regulatory officer.

If you have any questions regarding this CAR form, please 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.			☐
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.			☐
We will now consider what enforcement action is appropriate and notify you, referencing this form.			☐

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			
C2	C3	No action specified	N/A
C4	C3	No action specified	N/A

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.