

Compliance Assessment Report

Report ID:
CAR_NRW0031963

This form will report compliance with your permit as determined by an NRW officer

Site	Llantrisant Recycling	Permit Ref	AB3092FR		
Operator/Permit holder	Llantrisant Recycling Centre Limited				
Regime	Waste Operations				
Date of assessment	06/07/2017	Time in	12:00	Out	13:30
Assessment type	Site Inspection				
Parts of the permit assessed	Operational area				
Lead officer's name	Tye, Laoni				
Accompanied by	Sherratt, Kelly				
Recipient's name/position	Jonathan Wilson/ TCM	Date issued	07/08/2017		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). 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	CCS Category	Condition(s) breached
A1 - Specified by permit	C3	2.1.1
B3 - Infrastructure - Site drainage engineering (clean and foul)	C3	Schedule 1 Table s1.1
C2 - General Management - Management system and operating procedures	C3	1.1.1
D1 - Incident Management - Site security	A	

KEY: See Section 5 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,
O = Ongoing non-compliance, not scored.

Number of breaches recorded	3	Total compliance score (see section 5 for scoring scheme)	12
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If the Number of breaches recorded is greater than zero, please see Section 3 for 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 (eg. 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 advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

Environment officers Laoni Tye and Kelly Sherratt visited site on the 6th July 2017 to conduct a site inspection. The weather was very warm and dry at the time of the visit. We were accompanied around site by the site supervisor. We were then joined by TCM Jon Wilson at the end of the visit. This was an initial visit from the new regulatory officer Laoni Tye who will now be the point of contact for any queries, please use the following details going forwards:

Laoni.tye@naturalresourceswales.gov.uk

03000 65 4492

There were breaches recording during the visit which are outlined below:

A1 – Specified by permit. Category 3 breach.

Permit condition 2.1.1 states that the operator is only authorised to carry out the activities specified in Schedule 1, Table S1.1 (the "activities") The site is currently composting green waste on site which is not an authorised activity under your permit. There is a permit application currently in with NRW but this has not yet been issued in which case this constitutes an illegal activity.

Action: Due to the fact that there is a permit application in with us that is nearing the end of the determination we are not currently asking you to remove the waste from site. However, we wish to understand how this has been managed to date and what procedures are in place, to include procedures on preventing anaerobic conditions . We were advised that bio-aerosol monitoring had taken place, please send us the information in relation to this which includes any monitoring points and the results.

C2 – Management systems. Category 3 breach.

Condition 1.1.1 states that the operator shall manage and operate the activities in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints'

There were issues on site than can be attributed to poor management on site. Leachate had been left in the drainage channel with a potential pathway to ground and surface water. Large numbers of maggots could be seen in the channels which suggests that it had been there for a number of weeks. There was a very strong compost odour detected which could be felt at the back of the throat. Waste fines could be seen blocking the drainage channel meaning that the leachate was not draining away into the tanks on

site. We were advised that the leachate usually gets pumped back onto the compost heap. This is something that would usually be done to assist with moisture content of the piles rather than a standard procedure. We advised on site that this would now need to be pumped out and disposed elsewhere due to the high numbers of maggots in the leachate which would likely cause issues with flies.

****Since the visit the site has pumped the leachate into the storage tanks on site and work has to improve the drainage channels to ensure it is an impermeable surface with sealed drainage system****

There was also an issue with leachate seeping through the concrete blocks at the back of the compost heaps, again with a potential pathway to ground and surface water. There does not appear to have been any checks made on the infrastructure to ensure it is working effectively.

****Since the visit this has been investigated and the site have identified the issue is caused by compost being stored against the blocks. We have been advised that new plans are now in place to ensure a 'buffer zone' between the compost piles and the blocks to ensure leachate drains down to the channels and into the storage tanks.****

Action: Please provide evidence that this now constitutes 'an impermeable surface with sealed drainage'. If the blocks allow leachate to pass this would not be classed as a sealed drainage system and therefore additional infrastructure improvements will be required.

Action: Please ensure any processes and procedures are updated in the environmental management system. Infrastructure checks should be made on a routine basis as part of effectively managing the site.

B3 – Site drainage engineering (Clean and foul). Category 3 breach.

Schedule 1 Table S1.1 states that all non-hazardous waste must be stored and treated on an impermeable surface with sealed drainage. Whilst on site the drainage channels could be seen to be full of leachate. There was a gap at the top of the drainage channel with a direct pathway for the leachate to discharge onto the ground with a potential to enter ground waters and the near-by watercourse. Due to the fact that the channel was blocked at one end, there was nowhere else for the leachate to go and any additional liquid such as rain would have likely caused the leachate channel to overflow and discharge onto ground. This can also be attributed to poor management.

Action: See C2 – Management - breach above.

Overview of visit

Thank you for taking the time to walk us around site and discuss the issues but also explain some of the procedures. This section is to highlight the visit and anything that was seen and discussed.

There was a stockpile of wood chip to the left hand of the site, stored within a concrete bay. We were advised that this material is bought from South Wales Wood and is virgin wood to be used in the biomass boiler. The building adjacent houses the biomass and also has bays due to be used to dry out materials on site. The biomass will heat the building floors to dry out material although it was not yet up and running.

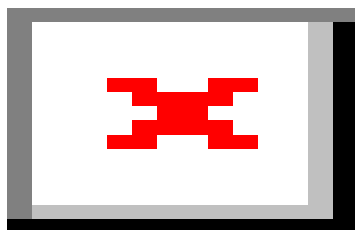
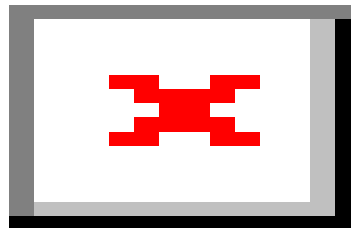
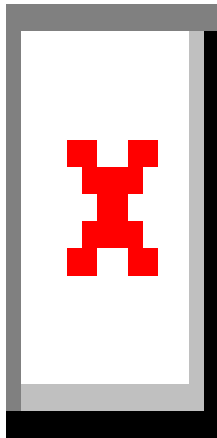
There were fines stored in the first bay of the building which we were advised come from Bryn Pica. These

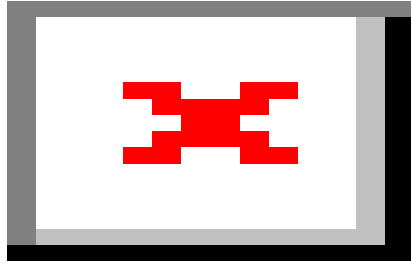
finer are then processed to separate out the glass which is currently sent to Recresco in Cheshire for further processing. We witnessed a stockpile of glass that had been screened out of the fines which appeared to be glass fines with some contamination of plastic. We were advised that this would be put through the process again to ensure minimal contamination.

We took non formal samples of some of the fines found on site to establish what they were made up of. Please note that these were not processed and will now not be analysed.

We are in the process of determining the permit variation and we will let you know once this has been determined. Once the variation is in place we will arrange another site inspection.

Photographs





If you have any questions please contact me using the details provided.

Many thanks

EPR Compliance Assessment Report

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Site	Llantrisant Recycling	Permit Ref	AB3092FR
Operator/Permit holder	Llantrisant Recycling Centre Limited	Date	06/07/2017

Section 3 – Enforcement Response

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.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			
A1	C3	Due to the fact that there is a permit application in with us that is nearing the end of the determination we are not currently asking you to remove the waste from site. However, we wish to understand how this has been managed to date and what procedures are in place. We were advised that bio-aerosol monitoring had taken place, please send us the information in relation to this which includes any monitoring points and the results. Any other checks that have been made should also be sent though, to include any temperature or moisture checks that have been made.	25/08/2017
B3	C3	Repair infrastructure and improve procedures on site.	25/08/2017
C2	C3	Please ensure these procedures are updated in the management system. Infrastructure checks should be made on a routine basis as part of effectively managing the site.	25/08/2017

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 verbally or 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 that 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 fulfil 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 (eg. 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
- Assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental 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 fifteen 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 officer's line managers using the informal appeals procedure. 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.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.