

Compliance Assessment Report

Report ID:
CAR_NRW0032258

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	24/08/2017	Time in	14:00	Out	16:00
Assessment type	Site Inspection				
Parts of the permit assessed	Operational area				
Lead officer's name	Tye, Laoni				
Accompanied by	Ward, Adam				
Recipient's name/position	Jon Wilson/ TCM	Date issued	09/10/2017		

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
B4 - Infrastructure - Containment of stored materials	A	
C3 - General Management - Materials acceptance	C3	2.3.2
F1 - Amenity - Odour	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	1	Total compliance score (see section 5 for scoring scheme)	4
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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 Adam Ward attended site on the 24th August 2017 to discuss previous CAR forms and any ongoing issues. A site inspection was also completed. We met with Tom Prichard (Director), Jon Wilson (TCM) and Gareth Danter-Hill (consultant). The weather was dry at the time of the visit. There was one breach recorded on site which is outlined below:

C3 – Materials acceptance. Category 3 breach.

Condition 2.3.2 states that waste shall only be accepted if a) it is of a type and quantity listed in Schedule 2 table(s) S2.1 b) it conforms to the description in documentation supplied by the producer and holder. There are waste fines EWC 191212 currently being stored and treated on site which is not a permitted waste type. The 'glass' fines are coming in from Bryn Pica as 191205 but we do not believe these fines match that waste code. We discussed this with you and advised that once the fines have been processed to separate out the glass then this would be classed as 191205. The fines were contaminated with other materials such as plastic, metal and paper/fibrous material which is screened out, meaning that these fines do not match the EWC code of 191205.

Action: A permit variation has already been sent into NRW in order to add this waste code to the permit. This breach would be suspended on future visits until a time that the permit variation is issued. Once the variation is in place please update EMS to reflect changes.

Details of the visit

Composting

This was scored as a breach during the last visit in July and therefore the site have not been breached for this again. The permit has since the visit been issued and therefore is no longer an unauthorised activity. Improvements had been made following our previous visit, the concrete blocks had been replaced with a curb and a 'buffer' zone put in place to stop compost/leachate being able to percolate onto unmade ground. The concrete had also been coated with a rubber sealant for additional protection and durability.

We discussed the leachate lagoons and were advised that there will be two storage lagoons either end of the channel which will pump leachate around in a closed loop type of system. This is going to be incorporated into the EMS but we agreed it in principle during the visit.

We also discussed putting leachate back on to the pile and explained that this is only done if required to add moisture to assist with the composting process, but should not be done as best practice.

The site are employing an expert to assist with getting the process up and running which we agreed was a sensible way forward.

Other discussions were had surrounding the operators other sites but these have been discussed outside of this report.

Many thanks

Laoni

EPR Compliance Assessment Report

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Operator/Permit holder	Llantrisant Recycling Centre Limited	Date	24/08/2017

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			
C3	C3	Permit variation to add waste codes and update EMS to reflect changes	23/11/2017

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.