	<b>EPR Compliance Assessment Report</b>	Report ID: 30388/0235834
<b>This form will report compliance with your permit as determined by an NRW officer</b>		
Site	Pant Y Llandron	Permit Ref 30388
Operator/ Permit holder	Vale Of Glamorgan Council	
Date	11/03/2015	Time in 12:45 Out 13:15
What parts of the permit were assessed	Environment management system	
Assessment	Site Inspection	EPR Activity: Installation Waste Op X Water Discharge
Recipient's name/position	Mr Stephen Bowen and William Hunter	
Officer's name	Laoni Tye, Sarah Lund	Date issued 20/03/2015

### 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
<b>a) Permitted activities</b>	1. Specified by permit	N	
<b>b) Infrastructure</b>	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	
<b>c) General management</b>	1. Staff competency/ training	N	
	2. Management system & operating procedures	A	
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	N	
<b>d) Incident management</b>	1. Site security	N	
	2. Accident, emergency & incident planning	N	
<b>e) Emissions</b>	1. Air	N	
	2. Land & Groundwater	N	
	3. Surface water	N	
	4. Sewer	N	
	5. Waste	N	
<b>f) Amenity</b>	1. Odour	N	
	2. Noise	N	
	3. Dust/fibres/particulates	N	
	4. Pests, birds & scavengers	N	
	5. Deposits on road	N	
<b>g) Monitoring and records, maintenance and reporting</b>	1. Monitoring of emissions & environment	N	
	2. Records of activity, site diary, journal & events	N	
	3. Maintenance records	N	
	4. Reporting & notification	N	
<b>h) Resource efficiency</b>	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	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.

Environment officers Laoni Tye and Sarah Lund conducted a site inspection on Wednesday the 11th of March. There was no one on site when we but we saw that a tanker came in at approximately 1pm which emptied waste into the de-watering bay. No breaches were recorded on site but we do have the following comments to make.

- Straw bales looked in need of replacing and grass could be seen to be growing through. We could see new bales piled up on site and therefore expect these are to be replaced shortly.
- There was a build-up of sediment and sludge in the holding/settlement tank after the straw bales. Please confirm whether or not these need to be maintained.
- There was a build up of sludge and sediment in the 1st series of the wetland cells. Please confirm whether or not these need to be maintained.
- The lid of the rubbish skip was open and litter could be seen scattered around site. Please keep this lid closed to reduce littering on site.

### Environment management system

We are currently looking at the ways sites manage their waste activities through their use of a working plan or Environment Management System, to ensure sites are being managed effectively. As well as improving compliance with permit conditions an effective working plan can help improve a business and can make cost savings.

I have looked through the working plan we have for Pant Y Lladron, issued in August 2013 and I have some queries and comments to make which I have outlined below. I am aware that there is an additional storage bay being constructed to help alleviate any storage issues on site. This will need to be reflected in the working plan once complete and it will be useful to make some additional amendments.

Table 1.1.1 of the working plan states that gully dredging wastes are considered under a 17 code. This EWC code is for construction and demolition wastes (including excavated soil from contaminated sites) and does not apply to dredging wastes. Only wastes listed in Appendix A, Table 1.2A are permitted on site.

Section 1.2 site processes and 3.6 emergency overflow mentions that there is an overflow outfall in place which discharges to a road gully on the A48. There are no plans or diagrams outlining the location of this, could the working plan please be updated to include a location with a plan. It is important to understand where this drain discharges to in case of an emergency.

Section 4.3.2 Waste acceptance – it mentions the waste receipts here and what details need to be included with each load. Could you please advise me what the process is with this and where they go, as there is no reception at Pant Y Lladron monitoring incoming loads or receipts.

4.3.5 – 3 Tertiary Dewatering. Which bay does this refer to on site as I believe there are 2 de-

watering bays on site. Is this correct? If there is no tertiary bay on site are the processes described here done at another stage of the process or are they not included in the treatment process?

We are aware that Stephen Bowen is leaving and William Hunter will be taking over as TCM and site manager. **Could you please advise if this has happened yet and if so can you supply the relevant TCM certificates showing competence.** The details on the working plan could also be updated to reflect this.

4.3.6 Describes the stages between the waste retention bays and the reed-bed system. Although it states what maintenance there is e.g straw bales are replaced periodically, it is not clear what checks are actually made at each stage and how it is determined whether the treatment process is working.


This is also relevant for the stages of the reed-bed. Please can you describe what checks are made at each stage and how it is determined whether the reed-beds are working affectively. It may be useful to meet on site to discuss this point at a later date.

Condition 5.1.3 Monitoring and sampling records.

Please submit to us the last years' worth of monitoring results in accordance with table 5.1 b for our records. Please submit to us within 1 month of the date of this CAR form.

Please can you get back to me with your comments and any actions agreed within 1 month from the date of this CAR form. If you have any questions or comments to make please get in touch at [Laoni.tye@naturalresourceswales.gov.uk](mailto:Laoni.tye@naturalresourceswales.gov.uk) or 03000 65 4492.

Many thanks,

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Operator/ Permit	Vale Of Glamorgan Council	Date 11/03/2015

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

<b>Section 4- Action(s)</b>			
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 <b>major</b> environmental effect	60
C2	A non-compliance which could have a <b>significant</b> environmental effect	31
C3	A non-compliance which could have a <b>minor</b> environmental effect	4
C4	A non-compliance which has <b>no</b> 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](mailto: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.