

	EPR Compliance Assessment Report	Report ID: 100103/0218369			
This form will report compliance with your permit as determined by an NRW officer					
Site	Waste Transfer Station, Llandow Trading Estate Unit 2		Permit Ref	EPR/EP3795EJ EAWML 100103	
Operator/ Permit holder	Site Serv Ltd				
Date	21/08/2014		Time in	09:10	Out 10:00
What parts of the permit were assessed	Storage and handling inside building, odour, and fire damaged waste removal				
Assessment	Site Inspection	EPR Activity:	Installation	Waste Op	X Water Discharge
Recipient's name/position	L England (TCM), Nigel England (director), Cc; Tony Morris, Michelle Boland				
Officer's name	William Powell, Jacqui Collier		Date issued	26/08/2014	

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	NA	
	3. Site drainage engineering (clean & foul)	N	
	4. Containment of stored materials	A	
	5. Plant and equipment	N	
c) General management	1. Staff competency/ training	N	
	2. Management system & operating procedures	N	
	3. Materials acceptance	A	
	4. Storage handling, labelling, segregation	*C3	2.1.1 Schedule 1 Tables S1.1;
d) Incident management	1. Site security	A	
	2. Accident, emergency & incident planning	N	
e) Emissions	1. Air	N	
	2. Land & Groundwater	N	
	3. Surface water	N	
	4. Sewer	N	
	5. Waste	NA	
f) Amenity	1. Odour	C3	3.2.1
	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	N	
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	2	Total compliance score (see section 5 for scoring scheme)	4
-----------------------------	---	--	---

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.

Site inspection with officers Will Powell and Jacqui Collier and Site Serv representative Tony Morris. Weather was cool and wet throughout.

Breaches

C4 - Management - Storage, Handling, Labelling & Segregation; Site is in breach of condition 2.1.1; schedule 1 – table s1.1:

“All waste unless otherwise specified shall be stored and treated inside a building upon an impermeable surface with sealed drainage.”

In that fire damaged waste is being stored in the external yard area rather than inside a building; fire damaged waste is not a specified waste. Score is suspended as an EPR Regulation 36 enforcement notice has been served requiring compliance with the permit condition.

CCS score Cat 3 - Suspended Score

F1 - Amenity - Odour; site is in breach of condition 3.2.1:

"Emissions for the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer [...]; waste odour was detected offsite, at levels likely to cause offence."

CCS Score - Cat 3

Waste odour

Upon arrival a noticeable waste odour was detected outside the Northern boundary of the. The waste odour was attributed to the storage of general waste within the building. Tony Morris reported that the amount and storage times of general waste currently onsite was fairly typical of Site Serv's current practice. The roller-shutter doors at the time of inspection were open. An electrician is due to come out to site, and will fix the roller doors, so that they can be closed.

Your current EMS OPL5, section 4.5.1 i) states that any material producing odours offsite, should either be contained or removed immediately off site. However, if the roller doors can be kept shut, except when they are needed to be open for operations, then this should hopefully limit the emissions of odour offsite. If odours are still detectable offsite when the doors are closed, then this may need to be an issue to be reviewed.

Storage and handling inside building

Waste volumes within the building are okay. The level of mixed kerbside recycling is good, and general waste levels are manageable. Site Serv are currently manually sorting some waste types. No mechanical treatment of waste is occurring within the building.

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

Site	Unit 2	Permit	EPR/EP3795EJ EAWML 100103
Operator/ Permit	Site Serv Ltd	Date	21/08/2014

Section 2 – Compliance Assessment Report Detail

A report had been received that large amounts of oil had been found in the sewer system. Site Serv were questioned whether they had been accepting any oil or experienced any plant failure involving the loss of oil. Site Serv reported that they had not accepted any oil, or had plant loose oil. Whilst Site Serv are permitted to accept some oil types within there permit, no oil was seen in inspections, or oil staining on the infrastructure.

Regulation 36 notice compliance

The fire waste has continued to be trommelled at the yard to the rear of the building. This is because some of the loads have been rejected as they did not reach the combustion criteria at the receiving site. Site Serv have now improved the quality of the material leaving site as an RDF precursor. Only a small pile remains to be processed and the trommelling should be complete within the next week. A large volume of the light weight RDF precursor material has been removed from site. The boundary fencing is now clearly visible. Site Serv estimate that approximately 2000 tonnes remain.



Tony reported that Site Serv may be pushed to meet the deadline of 19th September 14. At current rates Site Serv will be left with ~300t of the light weight material. Site Serv will struggle to meet the deadline due to holidays, including staff holidays, the NATO summit in Newport causing road disruptions, plus any other unexpected disruptions. Site Serv will still aim to meet the deadline and comply with the notice, however wished to make Natural Resources Wales aware at the first instance.

Whilst the light weight material will be removed, Site Serv will still be left with a large volume of fines from the trommelling process. Tony estimated the volume of fines on site to be around 3000 tonnes. A previous agreement between NRW and Site Serv was that the fines in hangar B be addressed after the notice expires. Site Serv wish to address both the fines at the hangars and on the Transfer Station together.

Please note: Natural Resources Wales South West region served the regulation 36 enforcement notice, and therefore any decisions over enforcement proceedings will be ultimately be taken by our South West region.



Transferring the permit

Site Serv Recycling Ltd is now up and running. Site Serv limited administration process will be completed around March 15. As such, it is important to transfer the permit to Site Serv Recycling Ltd. Pre-application advice will be provided for transferring the permit. The necessary advice and forms will be sent to Tony Morris and compliance officer Michelle Boland.

Waste Transfer Station Fines Audit.

A Waste Transfer Station Fines Audit is taking place nationally, to build up a picture of where WTS fines are going. This audit has been largely postponed, as whilst fines have been produced onsite, no receiving site as been arranged as yet.

	EPR Compliance Assessment Report	Report ID: 100103/0218369	
This form will report compliance with your permit as determined by an NRW officer			
Site	Unit 2	Permit	EPR/EP3795EJ EAWML 100103
Operator/ Permit	Site Serv Ltd	Date	21/08/2014

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.			X
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			
C4	C3	See regulation 36 notice	19/09/2014
F1	C3	Ensure rolling shutter doors can be closed to minimise odour emissions	N/A

	EPR Compliance Assessment Report	Report ID: 30327/0187902	
Name	William Powell	Date	26/08/14
Signature			

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.