

	EPR Compliance Assessment Report	Report ID: 100103/0241476			
This form will report compliance with your permit as determined by an NRW officer					
Site	Unit 2	Permit Ref	EPR/RB3993HH EAWML 100103		
Operator/ Permit holder	Siteserv Recycling Ltd				
Date	12/06/2015	Time in	12:00	Out	12:20
What parts of the permit were assessed	Waste storage				
Assessment	Site Inspection	EPR Activity:	Installation	Waste Op	X Water Discharge
Recipient's name/position	Luke England Director/TCM, C.C. Michelle Boland & Tony Morris				
Officer's name	William Powell	Date issued	23/06/2015		

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	NA			
	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		1.1.1	
	3. Materials acceptance	N			
	4. Storage handling, labelling, segregation	C3		2.1.1 Schedule 1 Tables S1.1;	
d) Incident management	1. Site security	N			
	2. Accident, emergency & incident planning	N			
e) Emissions	1. Air	N			
	2. Land & Groundwater	N			
	3. Surface water	N			
	4. Sewer	N			
	5. Waste	N			
f) Amenity	1. Odour	A			
	2. Noise	A			
	3. Dust/fibres/particulates	A			
	4. Pests, birds & scavengers	C3		1.1.1	
	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	3	Total compliance score (see section 5 for scoring scheme)	12
-----------------------------	---	--	----

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 of waste transfer station. Weather dry and warm throughout.

Breaches

C2) Management - Management Systems & Operating Procedures: Breach of condition 1.1.1;

"The operator shall manage and operate the activities:

- (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closures and those drawn to the attention of the operator as a result of complaints;"

The procedures detailed in Siteserv Recycling's Environment Management System are not being applied, waste is being stored outside the building. NRW also was not notified of this activity.

Category 3 breach

C4) Management - Storage, Handling, Labelling & Segregation: Breach of condition 2.1.1; Schedule 1, table 1.1;

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

Non-specified waste stored outside the building (see "Schedule 6 - Interpretation" of permit for definition of building)

Category 3 breach

F4) Amenity - Pests/Birds/Scavengers: Breach of condition 1.1.1

"The operator shall manage and operate the activities:

- (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closures and those drawn to the attention of the operator as a result of complaints;"

Waste stored outside of the building has attracted pests, and is not being operated in line with the Environment Management System.

Category 3 breach

Due to the recent closure of the Energy from Waste incinerator for maintenance there has been a significant build up of waste at the waste transfer station. As such there is more waste onsite than can be safely contained within the building. The main building was full with piles of mixed general waste, and waste transfer-station fines. It was noted that there were a number of flies in and around this building. Mixed waste was also stored in the side of the building still damaged by the fire. This part of the building does not meet the criteria of "building" set out in your permit, as it does not completely minimise emissions. The location may be more suitable than an uncovered pile in the yard, as it does provide some cover, reducing the access of pests and water ingress. However there were previous safety concerns with storing waste here when there was a Christmas backlog, due to loose panels, which I hope have been addressed.



The rear yard was also being used to store waste, including rubble, plasterboard, scrap metal, p.v.c window frames, and the residual fines from the waste fire. A pile of mixed general waste was being stored at the back of the building. Prior to the inspection a load of mixed recyclate was witnessed being tipped in front of this pile. During the inspection it was noted that there were a number of gulls and other scavengers on the waste pile. The mixed waste outside was also attracting flies and had a waste odour.



Whilst I appreciate that the incinerator plant closure was unexpected, and the WTS building too small to store any large volume of waste, the closure has resulted in a backlog of waste stored at the waste transfer station and pest problems onsite. The permit only allows non-specified waste, which includes mixed general and recyclate waste, to be stored inside the building. Siteserv Recycling Ltd have also failed to notify Natural Resources Wales that waste was being stored outside due to abnormal load procedures, as per our previous agreement and Siteserv Recycling's management system OL20. As such, Siteserv Recycling have been breached for these non-compliances. I understand that the incinerator is back up and running, and accepting waste. Siteserv Recycling Ltd will need to prioritise the removal of non-compliant waste, or at the very least, ensure the waste is managed in a way that minimises pests and emissions, as they did with the previous non-compliant storage.

Please could Siteserv Recycling provide an estimate of when the non-compliant mixed waste will be removed from site. Could you also let me know what steps have been taken to handle the pests affecting the waste.

	EPR Compliance Assessment Report		Report ID: 100103/0241476
This form will report compliance with your permit as determined by an NRW officer			
Site	Unit 2	Permit	EPR/RB3993HH EAWML 100103
Operator/ Permit	Siteserv Recycling Ltd	Date	12/06/2015

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			
C2	C3	No action specified	N/A
C4	n/a	Provide deadline for when waste will be completely removed	01/07/2015
C4	C3	Remove non-compliant wastes (mixed waste stored out of the building)	TBC
F4	C3	Provide information on recent actions taken to resolve pest problem	01/07/2015

	EPR Compliance Assessment Report		Report ID: 30327/0187902
Name	William Powell	Date	23/06/2015
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.