

	EPR Compliance Assessment Report	Report ID: 100103/0213840			
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	03/07/2014	Time in	09:55	Out	10:20
What parts of the permit were assessed	Storage and handling				
Assessment	Site Inspection	EPR Activity:	Installation	Waste Op	X Water Discharge
Recipient's name/position	L England TCM, N England Director - c/o Barry Mitchell & Co, Cc Tony Morris & Michelle Boland				
Officer's name	William Powell, Kelly Sherratt		Date issued	10/07/2014	

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; table 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	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	1	Total compliance score (see section 5 for scoring scheme)	0
-----------------------------	---	--	---

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 Kelly Sherratt, Tony Morris and Michelle Boland. Weather was warm and dry, with a light breeze.

Breaches:

C4) 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

Regulation 36 notice compliance

Waste at the back of site has been trommelled twice now, and is currently stored in one large pile. Site Serv estimate this pile is around 4000 tonnes. Waste was not visibly steaming or gassing off during visit, though Site Serv reported that occasionally it does steam, but in general the waste has cooled since the trommelling. Site Serv are in discussions with a company in England, and should be able to remove this material within the deadline of the regulation 36 notice (19th September).

Storage and handling

The volume of the kerbside mixed recyclables has been kept low, at a manageable level. General waste, such as card, hard plastics etc, activities are now taking place in the building as well. Volumes of general waste again are manageable. Waste types look to be compliant with permitted activities.

Infrastructure

Site Serv have replaced the panels on the building and installed rolling shutter doors allowing it to meet the criteria set out in the environmental permit. No waste odour was detected outside of the building suggesting it is currently effective at controlling odour emissions from mixed recyclable and general waste.

Where the fire damaged material has been cleared the concrete engineering was visible. In most places the concrete was sound, with one small broken patch of concrete, that may need patching up at some point in the future.

Environment Management System

Site Serv now have a regular bulk and clear operation working from the Llandow Waste Transfer Station, and currently are intending to continue using this Waste Transfer Station for the foreseeable future. As such I would expect an Environment Management System (EMS) to be in place to detail how Site Serv will manage their activities on this site. Please could you have an EMS in place by 11th August 2014.

Cont

	EPR Compliance Assessment Report	Report ID: 100103/0213840
--	---	---------------------------

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

Site	Unit 2	Permit	EAWML 100103
Operator/ Permit	Site Serv Ltd	Date	03/07/2014

Section 2 – Compliance Assessment Report Detail continued

Permit transfer and surrender

If Site Serv Recycling Ltd are taking over from Site Serv Ltd, then the permit will need to be transferred before Site Serv Ltd is liquidated. Please contact me if you require more information or advice on transferring this permit.

The Vale Business Park MRF permit surrender application is still on hold. Please could you confirm whether you are intending to go ahead with the permit surrender now the TFS is not required.

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 Reg 36 notice	19/09/2014
C2	N	Produce an effective and relevant EMS for Site Serv's operations at the Llandow Waste Transfer Station.	11/08/2014

	EPR Compliance Assessment Report	Report ID: 30327/0187902	
Name	William Powell	Date	08/07/14
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.