

Compliance Assessment Report

Report ID:
CAR_NRW0020576

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

Site	Site Serv Recycling Ltd	Permit Ref	JB3893HP			
Operator/Permit holder	Siteserv Recycling (sw) Limited					
Regime	Waste Operations					
Date of assessment	09/05/2016	Time in	10:10	Out	11:40	
Assessment type	Site Inspection					
Parts of the permit assessed	Waste storage, noise and dust prevention					
Lead officer's name	Powell, William					
Accompanied by	Bowder, Alex					
Recipient's name/position	Luke England/ Director	Date issued	03/06/2016			

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. 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
A1 - Specified by permit	A	
B1 - Infrastructure - Engineering for prevention and control of emissions	C3	3.1.1 & 3.3.1
C3 - General Management - Materials acceptance	A	
C4 - General Management - Storage, handling labelling and Segregation	O	2.3.1
E2 - Emissions - Land and groundwater	A	
F2 - Amenity - Noise	X	
F3 - Amenity - Dust/fibres/particulates and litter	X	

KEY: See Section 4 for breach categories, suspended scores will be indicated as such.
A = Assessed or assessed in part (no evidence of non-compliance), **N** = Not Assessed, **X** = Action only

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

Site visit following meeting with NRW officers Will Powell and Alex Bowder, and Siteserv Recycling Ltd staff Nigel England and Carl Jones. Weather was dry through out visit.

Breaches

B1 – Infrastructure – Engineering for prevent & control of pollution; breach of conditions 3.1.1 & 3.3.1:

“Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this rule if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.

“Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of Natural Resources Wales, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan, to prevent or where that is not practicable, to minimise, the noise and vibration.”

The track that runs alongside and to the west of Hangar A is made of gravel, and contains several pot holes. The use of this road is creating dust and noise emissions. The track would benefit from being re-surfaced, or vehicles diverted.

Category 3 breach

C4 – Management – storage, handling, labelling and segregation;

Breach of condition 2.3.1:

“The activities shall be operated using the techniques and in the manner described in Table 2.3 below.

Waste fines, wood and scrap are all stored outside of the building. These are not specified waste.

Table 2.3 Operating techniques

1. Unless stored or treated outside as specified waste:

a) all bulking, transfer or treatment of waste shall be carried out inside a building;

- b) all waste shall be stored in a building or within a secure container.
 - c) all waste shall be stored and treated on an impermeable surface with sealed drainage system.
2. Specified waste shall be stored and treated on hard standing or on an impermeable surface with sealed drainage system

Non-compliance scored recently on CAR form – considered ongoing non-compliance

F2 – Amenity – Noise; ACTION ONLY – condition 3.3.2:

“The operator shall:

(a) if notified by Natural Resources Wales that the activities are giving rise to pollution outside the site due to noise and vibration, submit to Natural Resources Wales for approval within the period specified, a noise and vibration management plan;

An effective noise management plan to be produced

ACTION ONLY

F3 – Amenity – Dust/fibres/particulates and litter; ACTION ONLY – condition 3.1.2:

“The operator shall:

(a) if notified by Natural Resources Wales that the activities are giving rise to pollution, submit to Natural Resources Wales for approval within the period specified, an emissions management plan;

An effective dust management plan to be produced

ACTION ONLY

Actions since last inspection

Waste fines, wood, scrap and plastic material continue to be stored outside.

Site inspection

Hangar B contained more slightly more waste than the previous visit, however there was still a wide gap between the two main piles of waste. A slight waste odour was detectable inside the building. No steaming or gassing off was observed from the waste. Siteserv Recycling report that they are still regularly monitoring the temperature of the waste stock piles.

The waste pile on the northern side almost has a fire break between the next pile. Baled waste appeared to be serving a purpose as partial barriers.

Outside of Hangar B, on the southern edge of the site, uPVC and hard plastic are still stored outside. Siteserv are still intending bringing this material inside.

The waste fines stored to the north of Hangar B were also inspected. The piles remain uncovered with the silage wrapping, however no staining or leachate pooling was observed.

Scrap metal and wood waste are stored outside of the building on the hard standing. Siteserv Recycling were looking to remove some of the scrap metal shortly.

Storage in Hangar A remains good, with volumes of waste being kept low. Siteserv Recycling have a new bailer on order. The generator, currently stored at the back of the hangar, is due to be relocated in an alcove in the side of Hangar A. Siteserv Recycling haven't consulted with a noise consultant or acoustics specialist, however anticipate this should have a significant improvement in managing the noise.

Along the road running behind hangar A, an unmanned sprinkler had been positioned, so that a light spray stretched across the road. There were some areas where water was pooling in pot holes, and if used as a long term solution, is likely to increase the number. Siteserv Recycling will be tarmacking this stretch of road shortly, starting work within the next fortnight.

The old concrete road leading to the weigh bridge is also cracked and broken and will need replacing.



Mixed general waste storage in Hangar B; the pile is joined to another pile of shredded hard plastic



Waste fines stored outside; fines are uncovered, though there is no sign of leachate pooling around material



Siteserv's track at the rear of Hangar A; road is currently dusty and full of pot holes. This road is due to be tarmacked.

EPR Compliance Assessment Report

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Operator/Permit holder	Siteserv Recycling (sw) Limited	Date	09/05/2016

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.

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			
B1	C3	Resurface track to reduce dust emissions and noise, or take vehicles across a different route	03/06/2016
F3	X	Effective dust management plan to be produced	30/06/2016
F2	X	Effective noise management plan to be produced	30/06/2016
C4	O	All non specified wastes to be stored within a building. Short term mitigation can include covering waste fines.	31/08/2016

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 reports 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 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.