

Compliance Assessment Report

Report ID:
CAR_NRW0020636

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	07/06/2016	Time in	14:50	Out	15:35
Assessment type	Site Inspection				
Parts of the permit assessed	Storage, fire risk, infrastructure, and generator				
Lead officer's name	Powell, William				
Accompanied by	Davies, Eleanor,Emily Williams				
Recipient's name/position	Luke England/ Director	Date issued	15/06/2017		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. 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	A	
B5 - Infrastructure - Plant and equipment	A	
C4 - General Management - Storage, handling labelling and Segregation	C3	2.3.1
F2 - Amenity - Noise	A	
F3 - Amenity - Dust/fibres/particulates and litter	C3	3.1.1

KEY: See Section 5 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,

O = Ongoing non-compliance, not scored.

Number of breaches recorded	2	Total compliance score (see section 5 for scoring scheme)	8
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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, Eleanor Davies and Emily Williams, and Siteserv Recycling Ltd staff Nigel England and Carl Jones. Weather was hot and dry throughout visit, with a steady westerly breeze.

Breaches

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.

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

Waste fines, wood and scrap are all stored outside of the building. Wood waste was being shredded outside, where there is limited control of emissions. These are not specified waste.

Category 3 breach

F3 – Amenity – Dust/fibres/particulates and litter; ACTION ONLY – condition 3.1.1:

“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.”

Dust from vehicle movements and wood shredding producing large amounts of dust. High potential for dust emissions offsite. An effective dust management plan needs to be produced.

Actions since last inspection

Significant infrastructure improvements have been made, with the relocation of the generator into an alcove of Hangar A, and a large section of road being re-surfaced with tarmac, removing potholes and reducing the dust risk.

Site inspection

Siteserv Recycling Ltd have appealed the planning decision turning down their application to operate as a waste management facility at Triple Crown House. The planning appeal is set for August, and Siteserv are intending to allocate a lot of resource into ensuring the Hangars site is right.

Waste hard plastics and uPVC continue to be stored outside of the hangar on the southern side, though the amount of uPVC has decreased a lot since previous visit. Siteserv Recycling intend to reduce the volumes of these wastes further, and then bring the operation inside.

There was a lot more waste in Hangar B than the previous visit in May. Siteserv Recycling estimate approximately 1000 tonnes more mixed general waste. There is no longer access through the centre of the building for emergency service vehicles. The risk of fire increases with stockpiling of waste, and whilst Siteserv Recycling have invested in a temperature probe/thermal lance for the waste, it is unlikely able to penetrate deep enough into the pile to get a reading for the centre. Siteserv Recycling are intending to reduce the volume of waste in this hangar significantly prior to the planning appeal inspection. The volume of waste needs to be reduced to decrease the fire risk as well. The temperature of the hangars was cooler than outside and no steam/gassing was observed.

A small amount of co-mingled collection recyclate was being stored in Hangar B. Siteserv Recycling are not processing this waste here, and are sending it off to a 2ndry MRF.

Outside Hangar B on the northern side fines continue to be uncovered, however Siteserv Recycling will be covering these before the planning appeal. Siteserv Recycling are also interested in screening the fines with a “finger screen” to remove the glass fraction from the fines. Please be aware that treatment of wastes outside of the building is not covered by Siteserv Recycling’s environmental permit.

Waste plastics stored outside are now destined for landfill. Siteserv Recycling are reluctant to send wastes to landfill, however need the area cleared for August and so are considering this as an option.

Waste wood was being shredded outside the front of Hangar B. This is not a permitted activity, as it is occurring outside the building. The process was producing large amounts of dust, however due to the wind direction this was being carried away from sensitive receptors. Siteserv Recycling are currently processing around 80 tonne a week of wood waste. Officers discussed whether Siteserv Recycling could consider operating under a waste exemption at a separate site. The T6 waste exemption would allow the treatment of some wood waste, however wastes that have come from a waste management source are excluded from this exemption; i.e. if the wood has been pulled out of mixed waste, it could not be used under this exemption.

The road running round the back of Hangar A has now been tarmacked, stretching much of the length of Hangar A of both sides, and joining the new concrete near the weigh bridge. The infrastructure looks sound. 5 mph markings have been made on the road. Officers observed a Siteserv Recycling vehicle driving slowly along the road; there are no pot-holes so the previous noise of rattling skips was not observed. Natural

Resources Wales have not received any recent noise complaints.

The hard standing area before the road however was very dusty, and officers observed a lot of dust being created from vehicle movements. Siteserv Recycling intend to concrete this area in the long term. Suitable dust management in the short term is required.

Inside Hangar A, a new bailer is being installed. There was a large stock pile of waste onsite because of this. Siteserv Recycling have also been pushing to finish the contract with the flood damaged paper mills, and so there were a lot of rolls onsite.

The generator has been inserted into an alcove of hangar A, and a wall knocked through, so access from inside that hangar can be attained. The generator fits well within the alcove, however was not operational, so were unable to ascertain whether it has made an improvement.

EPR Compliance Assessment Report

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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			
C4	C3	All storage and treatment operations to be moved within a building, accept specified wastes	11/08/2016
F3	C3	Ensure effective dust control is in place.	30/06/2016

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 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 fifteen 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.