

Compliance Assessment Report

Report ID:
CAR_NRW0001176

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	31/03/2016	Time in	10:00	Out	11:00
Assessment type	Site Inspection				
Parts of the permit assessed	Storage, fire risk, infrastructure, and generator				
Lead officer's name	Powell, William				
Accompanied by	Griffiths, Toby,Davies, Eleanor				
Recipient's name/position	Luke England/ Director	Date issued	05/05/2016		

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	
C4 - General Management - Storage, handling labelling and Segregation	C3	2.3.1

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 inspection with officers Will Powell, Toby Griffiths and Eleanor Davies, and Siteserv representatives; Nigel England, Carl Jones and Gordon Williams. Weather was dry throughout the visit.

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. These are not specified waste.

Category 3 breach

Actions since last inspection

Volumes have continued to reduce within hangar B, though no new firebreaks have been made within the waste, Siteserv Recycling are now regularly monitoring the temperature of the waste pile.

There is less waste within Hangar A, as a lot the bailed paper has been removed.

Waste material continues to be stored outside, including waste fines, and wood.

Site inspection

Siteserv Recycling have now purchased a thermal lance to monitor the temperature of waste piles, and have been doing this daily. This procedure has not been formally added to the IMS, fire prevention plan or site diary yet.



Waste stockpiles within Hangar B

The plastic is going to a new EfW plant, due to it's high Combustion Value. The plastic stored outside is to be shredded and added to this material. The baled RDF will leave as and when, but is not currently problematic due to it's higher quality.

Outside of the hangar there was a large amount of uPVC stored at the edge of the tarmac track. This waste will be offsite by the end of the month. Hard plastics are still being stored outside for pelletising.

Inert waste was being stored outside, as was wood, and scrap metal. Siteserv Recycling are looking to bring this material back inside a building once space is available. Waste fines remain outside, and uncovered.



Waste inerts and waste fines stored outside

The amount of material in hangar A has continued to reduce, with a lot of bailed material having been

removed since the previous visit. Paper, card and plastic film were all stored in separate piles, with large breaks between them.

Siteserv Recycling have removed the top soil from behind the hangars, leaving a wide hole. There is no current intention to back fill this, and will be done as and when suitable material is available.



Generator and biomass boiler at the back of hangar A

The generator was inspected. Siteserv Recycling were previously using rented generators, however have purchased this generator. Noise mitigation options were discussed, including relocating the generator around the side of the hangar, possibly behind a wall, or enclosing the generator within a building. NRW recommend Siteserv Recycling consult an independent acoustics specialist before taking any steps, as retrofitting noise-attenuation equipment can be more costly.

Waste wood feedstock for the biomass boiler was stored outside in old IBCs.

EPR Compliance Assessment Report

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Operator/Permit holder	Siteserv Recycling (sw) Limited	Date	31/03/2016

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.

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.

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	Remove non-specified waste stored outside, or bring material inside building or store within sealed container	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.