

## Compliance Assessment Report

**Report ID:**  
**CAR\_NRW0000148**

**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           | 10/02/2016                          | Time in     | 10:00      | Out | 11:00 |
| Assessment type              | Site Inspection                     |             |            |     |       |
| Parts of the permit assessed | Fire Risk                           |             |            |     |       |
| Lead officer's name          | Powell, William                     |             |            |     |       |
| Accompanied by               | South Wales Fire and Rescue Service |             |            |     |       |
| Recipient's name/position    | Luke England/ Director              | Date issued | 13/04/2016 |     |       |

### 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 |
|----------------------------------------------------------------------------------|--------------|-----------------------|
| C2 - General Management - Management system and operating procedures             | C3           | 1.1.1                 |
| C4 - General Management - Storage, handling labelling, 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

|                                    |          |                                                                     |          |
|------------------------------------|----------|---------------------------------------------------------------------|----------|
| <b>Number of breaches recorded</b> | <b>2</b> | <b>Total compliance score</b><br>(see section 5 for scoring scheme) | <b>8</b> |
|------------------------------------|----------|---------------------------------------------------------------------|----------|

**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 Fire and Rescue Service, and Siteserv representatives Luke England, and Carl Jones. The weather was dry during the visit, though the weather had been wet and very windy earlier in the week.

### Breaches

C2 – Management - Management system and 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, closure and those drawn to the attention of the operator as a result of complaints;”

Non-specified waste brought outside for storage – this is a route cause breach.

### 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.

**Table 2.3 Operating techniques**

1. Unless stored or treated outside as specified waste3:
  - 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 from previous CAR form**

A concern was raised about the amount of waste onsite and the fire risk this waste presents. Hangar A contained a large volume of RDF. Shortly after the visit this waste was removed to EfW, and no longer poses as great a fire risk in Hangar A. Siteserv fed back from the CAR form that the drains have now been unblocked - no pooling of water outside the entrance of Hangar A was seen.

Significant improvements have been made in Hangar B, detailed below. Waste fines remain uncovered since the last visit. High winds have continued over winter.

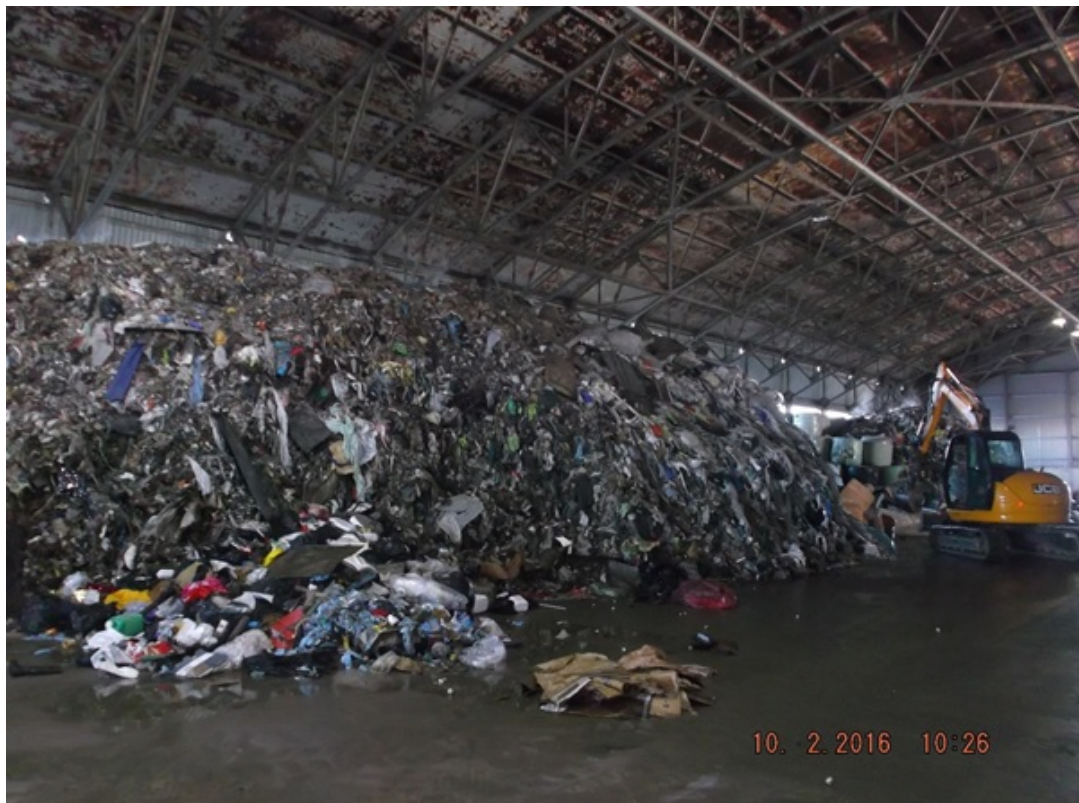
### **Fire prevention plan**

Siteserv Recycling produced a comprehensive fire prevention plan for their operations at hangars A&B. The report is a good representation of how the site currently is, and how Siteserv Recycling intends to comply with current guidance in future. I had some concerns over the timescales given in the plan to bring the site into compliance, however Siteserv Recycling have actioned many of these areas far quicker than outlined in the plan. I would still like to discuss the plan further, though many of my immediate concerns have been alleviated.

### **Hangar B**

Significant steps have been made towards reducing the fire risk within this hangar. Siteserv reported that they are currently taking waste to new outlets, other than the EFW plant in Cardiff, which has helped clear waste from the hangar. Waste is currently being stored in two, almost continuous piles stretching much of the length of the hangar, placed along it's edges. A wide gap runs between the piles, allowing safe access through the hangar and would likely be able to accommodate FRS engines or equivalent, should a situation arise.

Steam was rising from some of the general waste, particularly the stockpile along the northern edge of the hangar. There are currently no breaks between the lines waste of waste. The FRS recommended putting in place a break of 6m every 15-20m along its length, or using suitable concrete barriers. The FRS also recommended using some sort of thermal monitoring equipment such as a thermal lance; which would enable Siteserv Recycling to monitor internal temperatures in the stacks.



Steam rising from one of the stockpiles

It is important to ensure that Siteserv Recycling can maintain a turnaround of waste material, and any stacks that are being stored for a longer period of time are rotated. The FRS recommended rotating waste every 2-3 months or sooner if it shows signs of self-heating.

Siteserv have shredded the hard plastic that has been stored in the hangar, and are exploring options for its recycling/recovery/disposal. By shredding the waste, the volume of plastic has reduced significantly, increasing space in the hangar further.

### **Hangar A**

Hangar A now stores single stream wastes – paper, card and plastic film only. Some of the piles would benefit from fire breaks. Though the risk of self-combustion is low, ignition sources such as hot exhausts should be checked regularly.

### **Outside**

Waste trommel fines are currently being stored outside. The fines that have previously been stored outside have come uncovered in the recent high winds. Please cover these up as soon as possible to minimise water ingress. Siteserv Recycling have undertaken loss of ignition tests on the waste fines.



Waste fines stored outside

The covered fines are <15% LOI and the new fines are <10%, Siteserv Recycling are looking to landfill these fines. An alternative option Siteserv have mentioned is using the fines to make concrete blocks. Please be aware if you

intend to take this option further that your permit would not cover this activity and the resulting product may still be considered a waste.

Wood waste and scrap metal were stored outside, again these are not specified waste. The wood waste will now be going to South West Wood Recycling.

### **Biomass boiler**

An inspection of the biomass boiler's waste inputs found the feedstock material appeared visually suitable. A small amount of white smoke was seen coming from the chimney stack.

### **Generator**

We have been receiving complaints about the hours of operation of the generator. We had received a complaint of the generator being started early that morning – staff onsite confirmed that the generator had been started at 6 AM. Operating at this time in the morning is likely to generate complaints, unless measures are taken to reduce the noise impact.

We have recently received more complaints about noise from the generator. We will be considering some monitoring of the noise. As part of this, would you be able to provide some information on the generator, in particular it's LWA or decibels at 7m.

### **Llandow Trading Estate Waste Transfer Station**

No waste has been removed from this transfer station. Once the fire risk in the Hangars has been reduced sufficiently, it is Siteserv Recycling's intention to work to remove waste from this site. The deadline for removal of the waste from this site is 4<sup>th</sup> April 2016. Siteserv Recycling have acknowledged that, whilst they are intending on meeting this deadline, work may overrun.

## EPR Compliance Assessment Report

**Report ID:  
CAR\_NRW0000148**

**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 | Date       | 10/02/2016 |

### 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 |              |                                                                                                                       |            |
| C2                  | C3           | All specified wastes to be stored inside as soon as practicle                                                         | 31/08/2016 |
| C4                  | C3           | Remove waste fines from outside and either store inside a building with sealed drainage or inside a 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](mailto: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.