

Compliance Assessment Report

Report ID:
CAR_NRW0027060

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	24/01/2017	Time in	14:30	Out	16:10
Assessment type	Site Inspection				
Parts of the permit assessed	Infrastructure, waste storage, noise and odour emissions				
Lead officer's name	Powell, William				
Accompanied by					
Recipient's name/position	Luke England/ Technical Competent Manager	Date issued	30/10/2017		

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	
C2 - General Management - Management system and operating procedures	C3	1.1.1
C4 - General Management - Storage, handling labelling and Segregation	C3	2.3.1
D2 - Incident Management - Accidents, emergency and incident planning	X	
F1 - Amenity - Odour	C3	3.2.1

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	3	Total compliance score (see section 5 for scoring scheme)	12
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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 with NRW officer Will Powell and Siteserv Recycling Manager Carl Jones. Weather was cold and dry during the visit, however it had been raining recently.

Breaches

C2 – Management – Management system & 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 operators, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints”

Waste stockpiles in Hangar B have increased, reducing Siteserv Recycling's ability to manage the risk of fire and increased the likelihood of odour issues.

Stockpiles of waste need to reduce, resuming a high turnaround of waste and fire breaks need to be in place, and contingency plans acted upon as per your fire prevention plan.

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 being stored outside of the buildings, where there is no control of emissions. All non-specified wastes, including the scrap metal, wood, plastic, and fines should be stored and treated inside the building.

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

Category 3 breach

D2 - Incident management - Accident, Incident & Emergency planning;
ACTION ONLY - 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 operators, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints"

A review and update of the fire prevention plan is required.

F1 – Amenities – Odour; breach of condition 3.2.1:

"Emissions from the activities shall be free from odour 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 odour management plan, to prevent or where that is not practicable, to minimise the odour."

A strong waste odour detected outside, onsite. A complaint was received about odour during this visit.

Increased waste volumes and delayed turnovers increase the likelihood of waste odour issues. Efforts must be made to reduce the volume of waste.

Category 3 breach

Actions since previous visit

The outside area of the site was much tidier than the last visit, with less waste stored out of the building. Infrastructure improvements were being made to the road around the site. The volume of mixed general

waste inside Hangar B had increased substantially since the previous visit.

Site Visit

Significant infrastructure improvements have been made to the road surface around the site. Siteserv Recycling are creating a continuous smooth road surface around the site. One half of the entrance to the site, previously containing a lot of potholes, has been dug up and re-surfaced with reinforced concrete. This concrete road currently connects with the weighbridge, and at the time of this inspection, the existing hardstanding was being dug up to create a road that would join the existing tarmac road resurfaced last year. It is Siteserv's intention to bollard off the road, so that vehicles stick to the new concrete track. The entrance will be widened to cover both sides. This should help further minimise noise emissions from vehicle movements around site, as there should no longer be a pothole issue, provided the road is well maintained.

Hangar B was very full of waste. There was one continuous pile forming a slight L shape, running from the right of the entrance, and joining the main waste pile in the middle of the hangar. Another pile of waste was stored to the left of the entrance. On the left hand side from the entrance, there was a passage alongside the main pile, however having inspected the rear entrance as well, this does not go all the way through to the back of the hangar. It was a cold day, and there was a lot of steam seen coming off from the waste piles. There was also a strong waste odour in and around the entrance.

Siteserv Recycling's main receiving site has at short notice, stopped accepting waste. Email evidence of this was shown during the inspection. As a result, waste has now built up. Siteserv Recycling stated that they have reduced their waste inputs for the short term, and have arranged for a large volume of waste to leave site w/c 30th January.

The area outside of hangar B appeared to have been tidied up considerably. The volume of wood waste stored outside was down, and less waste was stored outside. There was no uPVC stored outside, though black plastic continues to be stored outside. Wood waste, scrap metal and waste plastic continue to be stored outside, though storage is much tidier than observed in previous visits.

The waste fines continue to be stored outside. Siteserv Recycling are considering new options for the next financial year to remove this waste.

Hangar A appeared well ordered. Though there were a lot of bales of waste onsite, there were reasonable breaks between piles.

Hangar B Fire risk & Odour

There is too much waste in hangar B. There are insufficient fire breaks, and a slower turnover of waste, which is increasing the risk of self-heating fires. The 50 week deadlines set out in Siteserv Recycling's Fire Prevention Plan, to bring operations in line with WISH and NRW guidance has now expired. On several occasions over the past 12 months Siteserv Recycling have greatly reduced the volume of waste stored, however volumes keep slowly increasing back to the levels they are currently. Siteserv Recycling need to ensure better contingency plans to deal with short notice shut-downs at receiving sites.

New WISH guidance on fire prevention is out for public consultation in the next month or so, and takes into account the burn-time testing that the Fire and Rescue Service have undertaken with various waste materials. In the meantime, Siteserv Recycling's fire prevention plan will need to be reviewed for 2017. Please continue to monitor the temperature of waste piles onsite. Please could you also provide NRW with regular updates on the progress in Hangar B.

A waste odour was detectable upon arriving at site, and could be easily smelt by the entrance to Hangar A.

During the course of the inspection a complaint was received about odour. The strength of the odour detected during this visit was enough to cause an emission off site.

Storage of waste outside of the building

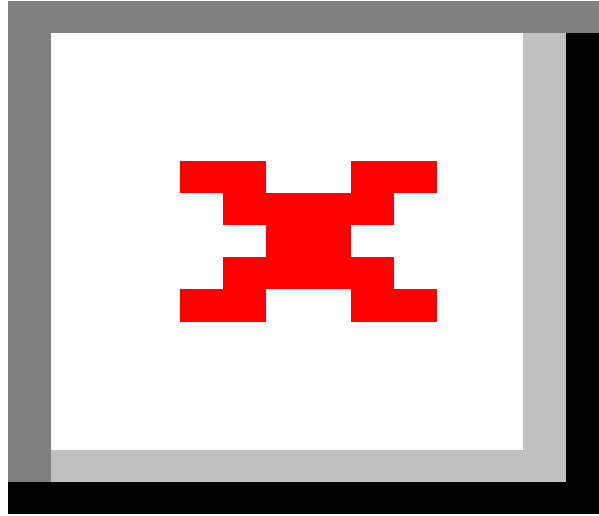
The standard rules permit requires all unspecified wastes to be stored within a building or with a secure container; specified wastes can be stored outside of a building. The permit boundary covers the whole site. As such, no exempt activities should not occur on the same location where they allow the same or similar activities, as there is no clear distinction between the activities. Regulation 22(8) of the environmental permitting regulations (2016) states;

“If a waste operation, stand-alone water discharge activity or stand-alone groundwater activity is registered as an exempt facility, that part of an environmental permit (or if applicable, the whole permit) that relates to the waste operation, water discharge activity or groundwater activity is revoked on the date of registration.”

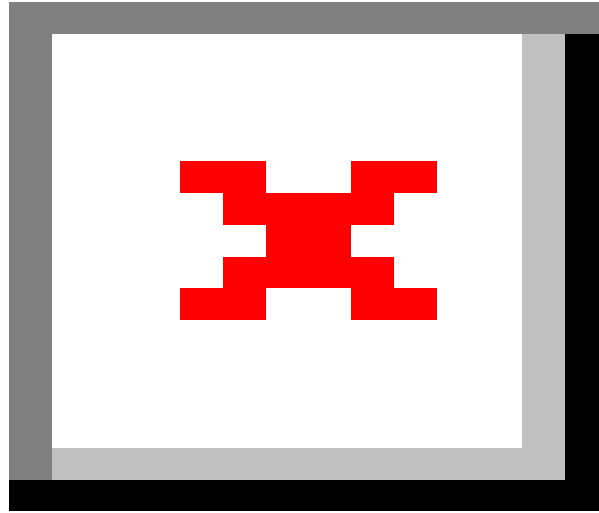
It was discussed after this inspection that Siteserv Recycling would like to operate part of their activities under exempt waste activities. Registering any exemption would effectively revoke that aspect of the environmental permit. If you wish to store wastes outside under exemption, you could surrender part of your permit area so that it only covers the two hangars. You would still require separate duty of care documents for any wastes accepted under exemption, and any movement of wastes between the two operations. Another option would be to vary the permit into a bespoke permit, including the storage of certain waste types such as wood and plastic outside of the hangars. Wastes could then be accepted under the same permit reference number, and you would have a permit that better suited your needs.

Site handover

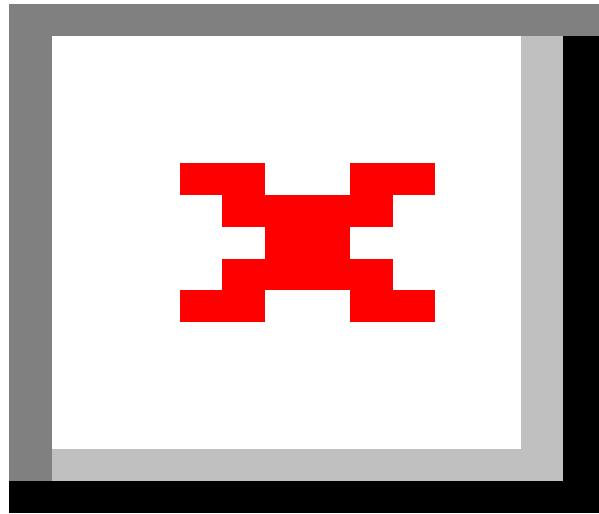
There will be a change of regulator this month for Siteserv Recycling Ltd. A handover meeting will be arranged for later in February, which should hopefully coincide with the appointment of Siteserv's new SHEQ.



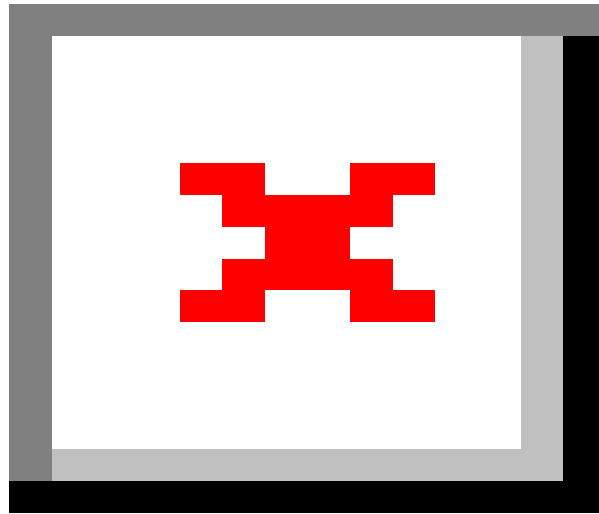
New concrete surface currently being installed onsite. The new road surface should provided a continuous smooth surface across the site, further reducing noise emissions



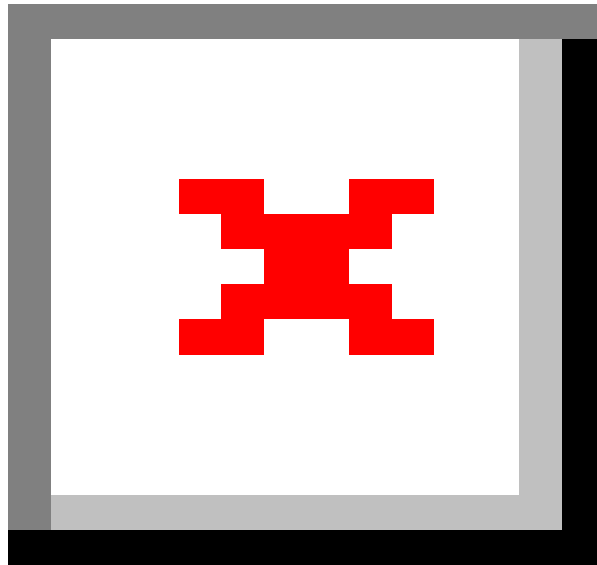
Hangar B; the waste on the right forms a continuous pile and joins the main pile in the middle of the hangar. There are no fire breaks between the piles. It was a cold day, and a lot of steam could be seen coming from the waste. A strong waste odour was detectable.



Waste at the rear entrance of hangar B.



Outside the front of hangar B; the area has been tidied up. The orange line marks the side of the new road Siteserv Recycling are installing.



Permit boundary.

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0027060**

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	24/01/2017

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			
F1	C3	Short-term: Close doors to hangar B when not in use to reduce emissions. Long-term: Reduce volumes of waste and improve turnover.	03/02/2017
C4	C3	All plastics, wood, metal and fines to be stored inside a building or sealed container on sealed drainage.	31/03/2017
C2	C3	Reduce volumes of waste and resume faster turnaround times	28/02/2017
D2	X	Review fire prevention plan	28/02/2017

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.