

Compliance Assessment Report

Report ID:
CAR_NRW0026603

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	08/11/2016	Time in	12:40	Out	14:00	
Assessment type	Site Inspection					
Parts of the permit assessed	Storage, fire risk, infrastructure, and noise					
Lead officer's name	Powell, William					
Accompanied by	Matthew Bradford					
Recipient's name/position	Luke England/ Technical Competent Manager	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
C2 - General Management - Management system and operating procedures	C3	1.1.1
C4 - General Management - Storage, handling labelling and Segregation	C3	2.3.1
E2 - Emissions - Land and groundwater	X	
F1 - Amenity - Odour	A	
F2 - Amenity - Noise	A	
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	A	

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 with NRW officers Will Powell, Matthew Bradford (on secondment from FRS), and Siteserv manager Carl Jones; weather was cold and dry during start of visit with light rain towards the end of the visit.

Breaches

C2 – Management – management system and operating procedures; breach of condition 1.1.1:

Mixed waste tipped and left outside hangar B on the made ground.

“The operator shall manage and operate the activities:

-) 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;”

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, fines and mattresses 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

E2 – Emissions – Land and groundwater; ACTION ONLY:

3.1.1 Emissions of substances not controlled by emissions 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

Leachate-like liquid around the pile of new fines needs investigating

ACTION ONLY

Actions since previous visit

Significant progress has been made in Hangar B in reducing the amount of waste stored in the hangar. There is now an access through the hangar, allowing more effective monitoring of the waste piles stored there.

Site Visit

The volumes of waste have reduced in hangar B. Siteserv Recycling have secured a new contract meaning 150 tonnes a day of mixed waste is now leaving site. This contract is in place until December, however Siteserv hope to extend this into the new year. All the waste that had been shredded and stored along the Northern edge of the hangar has now been removed. This now provides a long passage way through the hangar. The main pile of mixed waste remains similar to previous visits; ~6-7m high, and ~40m in length, with a smaller pile at the back of the pile, ~3-4m high – and looks to be newer. Mixed general waste, with a lot of bulky waste – mostly mattresses, was stored by the front entrance. No steaming or gassing off was noted on these piles and the waste looked to be generally very dry.

Waste material from Unit 2 on the waste transfer station had been taken into the rear of hangar B. It is Siteserv Recycling's intention to mixed this waste with the drier waste already in the hangar to improve the combustion value. The fire damaged waste from unit 2 was very black, and visibly steaming, and is likely to have a high moisture content from being stored outside. No strong waste odours were detected during the visit.

Siteserv Recycling hope to have the volume of waste down by the end of December. They can then install bays into Hangar B, allowing better separation, and also bring in wastes currently stored outside which will

improve the overall compliance.

There was a lot of waste stored inside hangar A. Much of the material is baled and looks ready to leave site. The shredder was inside hangar A to process cardboard prior to baling. The shredder was producing quite a bit of noise, however Siteserv do not intend to have the shredder in hangar A for long and will likely move it out by the end of the day (noise emissions were also inspected outside the hangar, please see further comments below and in the noise sub-section).

There was a slight haze and fummy atmosphere in hangar A, likely from the exhaust fumes from the generator and increased amount of plant.

There was a large quantity of co-mingled waste in hangar A. This is apparently the last load of this type of material. No flies were seen on the waste.

Outside hangar B, wood waste, scrap metal and fines continue to be stored outside of the building in breach of permit conditions. There were also several small piles of mixed waste tipped in various locations around this area. The area in-front of the fines that had previously contained small pools of what looked like leachate now appeared to be covered with rubble. There were however other similar pools that had formed elsewhere.

A pile of rock salt was tipped outside. Please be aware that storing such material outside can affect the salinity of any surface waters the areas outside drain into.

The road running around the back hangar A had a lot of debris and looked likely to produce dust as vehicles drove over it. At this stage in the visit, it started to rain, naturally dampening down the road. Siteserv's road sweeper is currently being repaired, however Siteserv need to ensure the road is regularly swept.

Outside of hangar A the noise of the shredder was not that detectable for the time of day, and could not be heard over an idling diesel engine nearby.

Fire Risk

The risk of fire has decreased since previous visits, however further action still needs to be taken to ensure that there are effective fire breaks between the material and a regular turnover of waste is maintained. Siteserv aim to have the volumes of hangar B down to a point where bays and fire breaks are in place before Christmas.

The thermal monitoring probe was not available for inspection.

Noise

Due to the shredder being located in hangar A, there was a lot more noise detected inside. However at the rear of the hangar the noise was not that noticeable for the time of day.

Lorries were observed to be driving slowly around the rear of the hangar.

There are a number of pot-holes at the front entrance of the site. A chain-loading skip lorry was observed going over the pot holes and a lot of noise was created from the banging of chains on the skips.

Housekeeping and General Management

In the area between hangar B and the race-track there are a number of piles where mixed waste has been tipped. It appears that some of these piles are part rubble and part mixed waste, and in these cases the rubble may have obscured the mixed waste when the waste was received at the weighbridge. However no action appears to have been taken after the waste has been tipped – either waste is not being inspected properly during the acceptance onto site or staff are ignoring the non-compliances. There were other incidents where it appeared mixed waste, without any rubble, had been tipped. The area where they have been tipped is outside of the building, and does not benefit from sealed drainage. Any run off from here will either go to ground water or directly into surface water drains. This is in breach of your environmental permit.

There were several filters stored outside with dusty material, likely extracted from some industrial or commercial operation. This material could easily be blown around site and is likely to contribute to dust emissions. Long-term exposure to dust can be harmful to health. There are some dusts that are permitted under Siteserv Recycling's permit but several that aren't. Please ensure that the waste acceptance procedures are being followed as per your IMS, and the exact nature of the waste is ascertained before being accepted onto site. Again this material is not specified waste and should be stored and treated inside a building.

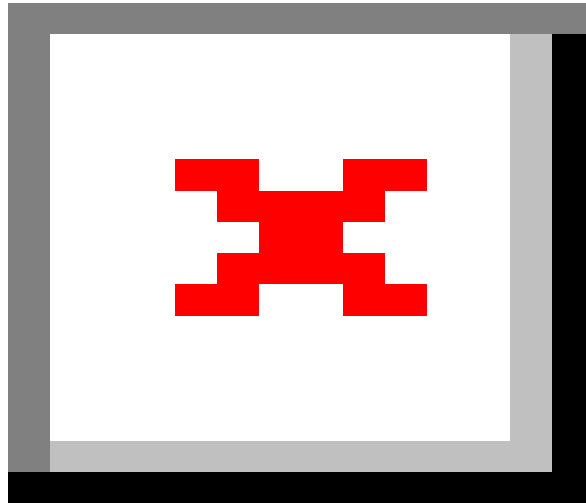
Leachate

There are new pools of dark coloured liquid around where the newer pile of waste fines are stored outside. Siteserv Recycling believe that this material may not be leachate because the fines are now covered preventing water ingress. However for several months these fines were uncovered, therefore this liquid may be related to egress from that. This issue needs further investigation, and NRW may require further action to be taken by Siteserv Recycling if it is believed that the fines are having an environmental impact. Please investigate further and report back to Natural Resources Wales with your findings by 30th November 2016, or as soon as reasonably practical i.e. if awaiting test results.

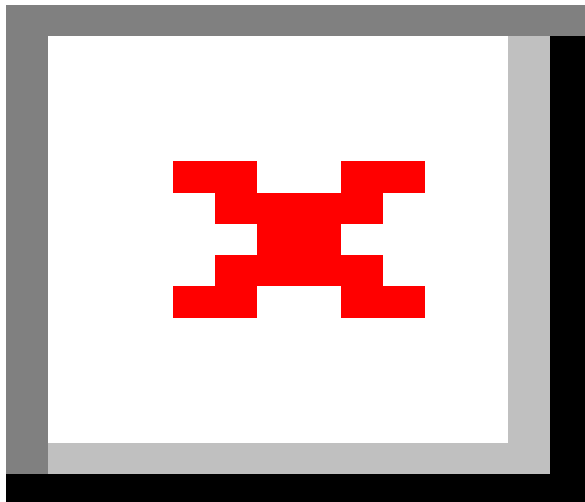
The area where they previously had been observed is now covered in rubble, so an inspection of whether the liquid remains here was not possible.

MF Regulations

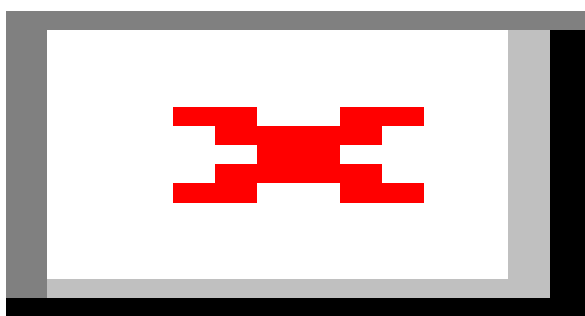
There was more co-mingled waste seen onsite. Siteserv Recycling's recent waste returns show that this year over 1000 tonnes of dry mixed recycling has been received onsite. This may have taken Siteserv over the threshold of the Material Facility regulations (1000t of household or "household like" co-mingled dry mixed recycling) – Siteserv may now need to notify NRW that they are a material facility and commence sampling of waste inputs and outputs. If this is the case, please contact Natural Resources Wales for more information.



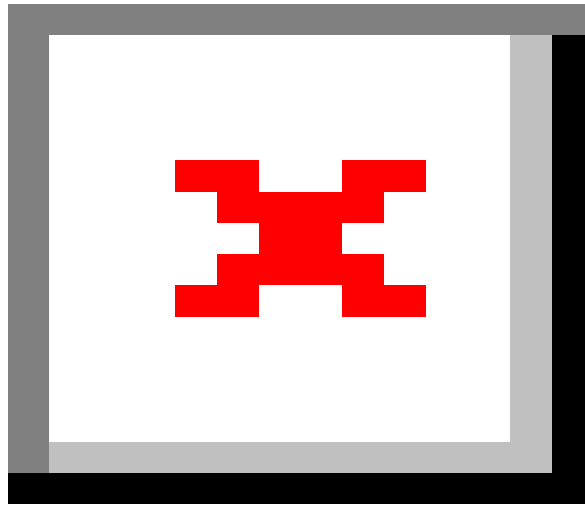
Waste in Hangar B. There is now a through route on the left hand side in the waste. There is also a firebreak between the pile in the foreground and the pile in the background. The pile in the background is ~6-7m high.



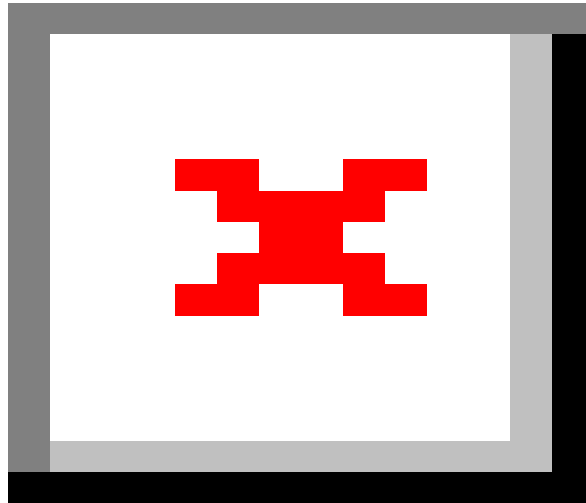
Mixed waste stored outside. This is not specified waste. The filters amongst this waste look to contain a lot of fine powdery material, likely to contribute to dust issues.



Photographs showing the area where the leachate like liquid was previously seen. The photographs show the same spot, although from different angles. Area where leachate liquid was previously seen has now been covered with rubble.



New pools of leachate like liquid have appeared around the banded waste trommel fines.



Build-up of debris on the road likely to cause dust issues. Please ensure the road is regularly swept.

EPR Compliance Assessment Report

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Site	Site Serv Recycling Ltd	Permit Ref	JB3893HP
Operator/Permit holder	Siteserv Recycling (sw) Limited	Date	08/11/2016

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			
E2	X	Investigate leachate-like liquid pooling around banded fines outside, and inform NRW of your findings	30/11/2016
C4	C3	All non-specified wastes to be removed, including fines, scrap, wood and mixed waste from outside building and either removed from site, or stored inside a building which can minimise emissions and benefits from an impermeable surface and sealed drainage.	31/12/2016
C2	C3	Drivers should be made aware of waste acceptance procedures, as outlined in IMS. Where wastes are incorrectly tipped, such as non-specified waste tipped outside a building, remedial action needs to be taken.	16/11/2016

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.