

Compliance Assessment Report

Report ID:
CAR_NRW0031763

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	24/05/2017	Time in	10:00	Out	12:00	
Assessment type	Site Inspection					
Parts of the permit assessed	Storage					
Lead officer's name	Tye, Laoni					
Accompanied by	Ward, Adam					
Recipient's name/position	Carl Jones and Luke England/ TCM and Director	Date issued	16/06/2017			

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
C3 - General Management - Materials acceptance	A	
E1 - Emissions - Air	A	
F1 - Amenity - Odour	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	0	Total compliance score (see section 5 for scoring scheme)	0
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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

Environment officers Laoni Tye and Adam Ward met with Carl Jones, Gareth Tevlin and Gareth Danter-Hill to discuss updates and address any concerns with previous CAR forms and compliance notices. An inspection was also conducted. Please see below for overview of the meeting. Breaches were recognised but have not been recorded on this CAR form due to them being on-going compliance issues (see previous CAR forms).

We discussed the re-issue of the compliance notice and the need for end dates to be included to ensure all fire burnt waste is removed and that relevant plans are updated in a timely manner. A volumetric survey is due to take place to ascertain exact volumes and cost up of its removal, to be included in a plan.

We discussed weighbridge reporting and agreed that they could now be submitted on a fortnightly basis. Providing waste removal becomes consistent and in line with agreed plans then this can change to monthly reporting in the future.

There were discussions in terms of processing the fire burnt material and whether it would be an option to carry out treatment on the waste in Hangar A to increase recycling and reduce volumes of waste for disposal. As discussed during the visit please submit a proposal to us outlining your plans if you wish to do this. NRW will make an assessment on your proposals and determine whether you are able to comply with your IMS and ensure that the associated risks are sufficiently managed.

Fines

There were discussions about putting a cover underneath the fines to act as a type of 'cell' stopping the ingress of water and reducing the leachate. While this may reduce the risk of leachate entering the ground, the storage of fines in this location without sufficient infrastructure will remain a breach of the permit.

Hangar A

RDF bales do not appear to have decreased in this hanger and plastic bales were being stored up against the bales at the time of the visit (see photo). We discussed the concerns around this due to the length of time the RDF has been stored on site. Any RDF that has been stored for longer than 3 months has an increased risk of self combustion and due to there being no fire breaks between this and the baled plastic it could easily spread and could be difficult to extinguish. We understand the adjacent plastic was due to be processed/removed and fire breaks will need to remain in place following this.

We understand that there is a thermal probe now on site which we recommend using to monitor any heat levels in the RDF. We suspect this will be included in the new Fire Prevention and Mitigation Plan and we recommend it is put into place in the interim.

There was a stockpile of loose plastic to the right of the hangar that was very tall and almost touching the top of the hangar. There were fire breaks either side however and material is currently being circulated with 'first in first out' and this should therefore be reducing any fire risk

within the piles.

Photographs



If you have any questions please get in touch.

EPR Compliance Assessment Report

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Operator/Permit holder	Siteserv Recycling (sw) Limited	Date	24/05/2017

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.

We will now consider what enforcement action is appropriate and notify you, referencing this form.

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			

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.