

Compliance Assessment Report

Report ID:
CAR_NRW0023815

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	21/07/2016	Time in	10:40	Out	11:50	
Assessment type	Site Inspection					
Parts of the permit assessed	Waste storage, noise and dust prevention, and fire risk					
Lead officer's name	Powell, William					
Accompanied by	Hughes, Rhys					
Recipient's name/position	Luke England/ Director	Date issued	03/08/2016			

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
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
C2 - Infrastructure - Management system and operating procedures	C3	1.1.1 & 1.13
C4 - Infrastructure - Storage, handling labelling and Segregation	C3	2.3.1
D2 - Infrastructure - accidents, emergency and incident planning	C3	1.1.1
F1 - Infrastructure - Odour	A	
F2 - Infrastructure - Noise	X	
F3 - Infrastructure - Dust/fibres/particulates and litter	X	

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 inspection with Rhys Hughes and Will Powell, and Siteserv Recycling director Nigel England. Weather was warm and dry during visit.

Breaches

C2 - General management – Management Systems and Operating Procedures; breach of condition 1.1.1 & 1.1.3;

“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”

Any persons having duties that are or may be affected by the matters set out in these standard rules shall have convenient access to a copy of them kept at or near the place where those duties are carried out”

Waste being stored outside of the buildings, including scrap metal, wood, plastic, waste fines and mattresses. The mattresses were being treated outside. Management seemed unaware of requirement to store and treat all non-specified wastes inside.

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.

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

D2 – Incident management – Accident, emergency & incident planning; 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. Stockpiles need to reduce, with a high turnaround of waste and fire breaks need to be in place as per your fire prevention plan.

Category 3 breach

F3 - Amenity – Dust/fibres/particulates; ACTION ONLY – condition 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 breaches 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”

Dust arising from vehicle movements onsite have the potential to cause dust emissions. An effective dust management plan needs to be in place.

ACTION ONLY

Actions since last inspection

The PVC stored at the side of hangar B was now all in a ro/ro skip ready for removal.

The waste fines stored outside of Hangar B now have a more effective cover over them, meaning the silage wrap is less likely to be blown open in high winds, reducing the water ingress and pollution risk of this material.

The generator in Hangar A is now operational. The new location appeared to have effectively reduced the

detectable noise levels during our inspection.

Site inspection

Municipal/general waste was being shredded in Hangar B during the inspection by the entrance of the hangar. There was a pile of waste already shredded near the entrance. The amount of waste within this hangar is still very high, with a channel between the two long piles ~5m at some points. There would not be sufficient access for an emergency services vehicle through the hangar. An area at the rear of the hangar has now been cleared, where previously hard plastics were stored.

With waste volumes this high, it seems unlikely that a quick turnaround of waste can be maintained, increasing the likelihood of waste heating up. Some steam was noticed from the piles.

Siteserv Recycling's IMS includes a commitment to prioritise fire prevention, however the arrangements listed in Appendix C of Siteserv Recycling's fire prevention plan have not been actioned. Whilst Siteserv Recycling may continue to monitor the temperature of the piles using their probe, the probe is unlikely to penetrate deep enough to reach the centre of the pile to monitor temperatures there.

Siteserv Recycling stated that they have signed a new contract, and will be committed to 250 tonnes off-site a week. NRW intend to follow up this inspection in August to see whether Siteserv Recycling reduces the amount of mixed waste onsite.

Outside the rear of hangar B, mattresses were being manually treated, with the covers and foam removed by hand from the steel frames. All non-specified wastes should be stored and treated inside a building. Siteserv Recycling had moved this activity outside, due to the level of dust currently inside hangar B due to the waste shredder. The storage and processing of mattresses, and any other wastes is in breach of your permit.

The waste fines stored outside have been given a new cover. In addition to the silage wrap previously used, a thick canvas-like material, with integral straps and weights, has been used to cover the fines. This should ensure that during strong winds, the fines remain covered, and the level of water ingress, and risk of pollution are reduced. Storing non-specified wastes outside of a building on ground without sealed drainage is still a breach of permit, but Siteserv Recycling have minimised the risk of environmental impact.

A trial had recently been completed of producing concrete blocks from waste fines. Two blocks had been produced, and were made with a 40% fines mix. The blocks had a rough surface, with some shallow surface cracks. It will be interesting to see how these blocks fair against conventional concrete blocks. Siteserv Recycling are working on an end of waste assessment for these blocks.

Siteserv Recycling have purchased a dust sweeping vehicle to reduce the level of dust onsite. No dust emissions leaving site were observed during our inspection, however dust was observed from vehicle movements over the areas of hard standing between and around the Hangars which, depending on wind direction, could cause an issue off site. Siteserv Recycling intend to improve the road surface in this area in the future. In the meantime however, a dust management plan will need to be produced formalising Siteserv's measures for controlling dust emissions.

Hangar A contained baled plastics. The waste levels seemed under control here, and there was still enough access for emergency service vehicles, and fire breaks between waste piles.

During the inspection the noise emissions from site were observed. The relocation of the generator appears to have significantly reduced the noise emissions. Siteserv vehicles were observed adhering to the 5mph speed limit on the new road around the back of Hangar A. Siteserv Recycling are considering putting in place a traffic light system to prevent vehicles using this stretch of road before 7AM. Siteserv's old generator is still onsite, but is currently not in use. Siteserv's current intention is to put this generator inside an alcove in Hangar B, just as they have in Hangar A. The generator would power a new baling machine in

Hangar B.

No waste related odours off site were detected during the visit. The only odorous wastes were contained within Hangar B, and these smells appeared to have dispersed a few metres away from the Hangar entrance.

New fire prevention guidance

NRW have agreed the new fire prevention guidance for Wales. The document can be viewed here: <https://naturalresources.wales/media/678552/nrw-fire-prevention-guidance-2016v1.pdf>. This will replace the previous guidance for Wales; TGN 7.01. All standard rules sets, including SR2008No3 – which conditions permit EPR/JB3893HP refer to, will be amended to include a condition requiring compliance with the latest guidance. We do not currently have a date for when this variation will take effect, however it would be advisable to make sure your current Fire Prevention Plan will meet the guidance.



Waste being shredded at the entrance of Hangar B



Concrete block produced with 40% mixed waste trommel fines



The generator, now contained within an alcove of Hangar A



Waste volumes in Hangar A still well controlled

EPR Compliance Assessment Report

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Operator/Permit holder	Siteserv Recycling (sw) Limited	Date	21/07/2016

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			
C2	C3	All non-specified wastes to be stored and treated inside a building that effectively controls emissions	19/08/2016
F3	X	Dust management plan to be produced	31/08/2016
F2	X	Noise and vibration management plan to be produced	31/08/2016
D2	C3	Reduce volume of waste and put in place fire breaks as per Fire Prevention Plan	02/08/2016
C4	C3	All non-specified wastes to be stored and treated inside a building that effectively controls emissions	19/08/2016

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 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.