

Compliance Assessment Report

Report ID:
CAR_NRW0026379

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	31/08/2016 - 28/09/2016	Time in	10:30	Out	12:00
Assessment type	Site Inspection				
Parts of the permit assessed	Waste volumes				
Lead officer's name	Powell, William				
Accompanied by					
Recipient's name/position	Luke England/ Director	Date issued	07/10/2016		

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
C3 - Infrastructure - Materials acceptance	C3	2.2.1
C4 - Infrastructure - Storage, handling labelling and Segregation	C3	2.3.1
D2 - Infrastructure - accidents, emergency and incident planning	C3	1.1.1
	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
------------------------------------	----------	---	-----------

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

CAR form covering 2 visits to Siteserv Recycling; 31st August 2016 and 28th September 2016. Breaches have been amalgamated where applicable, however CAR form content has been split into two parts. Site visit 31.08.16 with NRW officer Will Powell and Siteserv Recycling TCM and director Luke England; weather dry throughout visit. Site visit 28.09.16 with NRW officers Will Powell, Matthew Bradford (on secondment from FRS), and Siteserv manager Carl Jones; weather was dry throughout visit.

Breaches

C3 – Management – Materials Acceptance; breach of condition 2.2.1:

“Waste shall only be accepted if:

-) It is of a type and quantity listed in table 2.2 [...]”

Damaged fridge accepted onsite, which is hazardous waste. Material not rejected or quarantined.

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

Category 3 breach

D2 – Incident management – Accident, emergency & incident planning; ACTION ONLY:

“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”

Provide regular updates on monitoring and progress at reducing the amount of waste onsite

Action only

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, and contingency plans acted upon as per your fire prevention plan.

Category 3 breach

Site visit 31st August

Actions since last visit

The waste mattresses that were being stored and taken apart during the last visit are no longer stored outside. Waste uPVC has also been brought inside hangar B.

Site visit

Hangar B contained a lot more waste than had been seen in the previous visit. Waste piles filled much of the central area of the hangar. At the entrance of Hangar B, a waste shredding operation was underway, with the aim to reduce the volume of the waste within the hangar. The amount of waste appears greater than July. Apart from the operational area at the front there was limited access into the Hangar, and there was no longer a gap between the piles, therefore there could be no emergency service access through the hangar. Further waste, from Unit 2 on the Llandow Trading Estate is intended to be brought back to the hangar.

With waste volumes this high, it seems unlikely that a quick turnaround of waste can be maintained, increasing the likelihood of waste heating up. Siteserv are confident that they can bring the volume of waste down significantly by the end of October, to levels similar to those seen in the spring. Siteserv Recycling agreed to provide regular updates on their progress at reducing the amount of waste onsite and temperatures

of the piles.

A waste odour was detected near the boundary at the back of Hangar B. Siteserv Recycling report that the Hangar doors are closed at the end of the day to minimise emissions, and this odour is not detectable close to receptors. The odour was not detectable outside the front of Hangar A. Please be aware however that the longer waste material is kept onsite for, the more likely it is to cause an odour problem.

At the rear of the hangar a larger area had been cleared, and was now used to store the uPVC waste. Siteserv state they have not “stockpiled” the mixed waste that is stored on this side of the hangar; with pile heights less than 4m they can more easily be loaded into a container/lorry.

RDF bales had been moved out of Hangar B into both the porch area of Hangar B, and inside Hangar A. No odour or leachate was noted around these bales.

The generator in Hangar A was not operational, meaning the baling plant and hogger could not be used. Despite this, volumes in this hangar remained low, and did not appear to pose a significant fire risk.

The rubble waste stored outside, near the front of Hangar B contained a fine powdery material. Please ensure this does not contribute to dust emissions.



Waste piles in Hangar B; there is limited access for emergency services.



Heights of some of the piles at the back of Hangar B are lower, so that they can be quickly loaded into containers/lorries



Powdery material amongst the rubble waste stored outside.

Site visit 28th August

Actions since last visit

The generator in Hangar A has been replaced, and is now operational. Waste volumes in this hangar appear to have been managed well, despite the plant to process the material being down.

Siteserv Recycling Ltd have submitted a draft noise management plan.

Site visit

Hangar B

The volume of waste inside Hangar B continues to be high. As seen in the previous visit, there is an operational area near the front entrance where Siteserv are shredding their waste. There is a long pile on the left as you walk into the hangar which all looked to have been recently shredded. The pile is around 5m high and looked to be over 50m in length. Shredding the waste onsite in the hangars means less processing time at their receiving sites, which allows more transportation.

On the right hand side of the entrance, a large pile of mixed waste was ~7m high, and contained a lot of mattresses, that have been received from a local authority contract. It was noted that some of the waste was

directly under one of the hangar lamps, and appeared to be steaming. The heat of the lamp may have been warming the waste. Carl Jones said it would be actioned to lower the height of the waste pile.

The main pile appeared to be similar in size to the previous visit. The pile has several peaks, but appears to be 6-7m high in general.

Inspecting the waste at the back entrance of Hangar some of the waste there appeared to be steaming, which suggests some heat in the waste.

Siteserv Recycling continue to monitor the temperature of the piles, however their thermal monitoring lance was not available for inspection, as had been temporarily lent to another operator. NRW may return to site to inspection the temperature monitoring procedure.

Siteserv's main receiving site is still in commission, so Siteserv have not been able to meet their commitments of set tonnages per week. Once the site is accepting waste again – anticipated week commencing 3rd October, Siteserv should be able to remove 500t a week.

No fire breaks in the waste have been made. Though an emergency vehicle may be able to access the front and back of the piles, there is limited access to deal with a deep seated fire. Again with such high volumes, it could take several weeks to clear the waste – excluding the incoming wastes that Siteserv will continue to receive. Priority should be given to introducing fire breaks, and ensuring there is an effective system for monitoring the temperature of piles and maintaining a turnover of the older or warmer wastes. Regular updates should be provided on the monitoring and progress at reducing the amount of waste onsite.

Outside

In the area alongside Hangar B, various waste material was being stored outside, including fines, plastic, scrap metal, wood and rubble. Apart from inert wastes, all other materials should be stored inside a building with sealed drainage or in a sealed container. In between the waste fines and rubble, there was a pool of dark coloured liquid that resembled leachate. If this material has been leached out from the waste trommel fines, then it would suggest that the current mitigation infrastructure is inadequate. Storing the waste fines outside of a building with a sealed drainage system is in breach of the permit conditions. If this material is leaching then the environmental risk from storing the fines outside on made ground is greater than previously understood. This issue was raised with Siteserv Recycling's SHEQ consultant who believes the liquid has come from the rubble, not the fines. Efforts will be made to clear this area up.

A fridge was smashed up on the hard standing. The majority of fridges are hazardous waste. Siteserv's permit does not cover the storage and treatment of hazardous waste. Hazardous waste should be rejected at source, however if fridges are accidentally accepted then they need to be suitably quarantined. Storing damaged fridges outside on made ground does not qualify.

Batteries, glass, bottle caps, spent shotgun cartridges and metal fines were stored in two skips outside. Again this material should be stored inside or within a sealed container.

The unloading and loading of roll on skips was witnessed during the inspection. Though there was an increase in engine noise, i.e. increased revving, no bangs, scrapes or screeches were noted during this process.

Hangar A

The generator has been replaced in this Hangar, meaning all the plant is now operational again. The exhaust

extension pipe hasn't been connected, meaning some of the fumes were entering the hangar.

The volumes of waste in this hangar continue to be well managed. Despite the bailing plant being down for some time, levels of paper do not seem to have increased.

Siteserv Recycling had started to accept some co-mingled wastes; plastic bottles and tin cans. The amounts of waste were reported to be under the Material Facilities threshold, with Siteserv currently accepting around 20t a month. A number of flies were found to be attracted to the waste. If this waste is to continue to be accepted a pest management plan will be required, as unwashed food containers will attract pests. However it is understood that Siteserv Recycling will not continue with this waste stream.



Photograph from the entrance of Hangar B. The pile on the right is mixed waste with a lot of mattresses in. The pile was seen to be steaming underneath the lamps of the hangar.



Shredded waste pile, stretching over 2/3rds of the Hangar.



Waste batteries, glass, bottle caps, spent shotgun cartridges and metal fines stored in skips outside. This

waste should be stored inside or in a sealed container.



Waste damaged fridge stored outside on made ground.



Leachate-like liquid found pooling between rubble and trommel fines



Co-mingled waste stored in hangar A. The waste was attracting a number of flies.

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0026379**

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	31/08/2016

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			
C4	C3	All non-specified wastes to be stored and treated inside a building or sealed container that effectively controls emissions	31/10/2016
D2	C3	Reduce volume of waste, put in place fire breaks and utilise contingency plans as per Fire Prevention Plan	31/10/2016
D2	X	Provide regular updates on progress regarding monitoring piles and reducing amount of waste	31/10/2016
C3	C3	Suitably quarantine and remove damaged fridge from site to a suitably authorised facility	14/10/2016

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.