

Compliance Assessment Report CAR_NRW0039846

Permit being assessed: RP3195FP.

For: Cwmbran Service Centre, held by Rentokil Initial UK Ltd

At: Cwmbran Service Centre, Unit 334, Woodside Way, Springvale Industrial Estate, Cwmbran, Torfaen, NP44 5BR.

Type of assessment carried out: Site Inspection, Reason: Routine.

On 19/04/2022 between 09:55 and 11:00.

Parts of permit assessed: 1, 2, 3 & 4

NRW Lead Officer: Jak Rose.

Report sent to: Lorraine Carter , Branch Manager on 29/04/2022.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
C2 - General Management - Management system and operating procedures	Action only (X)	
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Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
0	0

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

Criteria	Action needed	Complete by
C2	Update current site map to reflect the current boundaries of each section pest control, washroom and medical.	29/07/2022
C2	Ensure all hazardous wastes removed from the site are assigned the registered premises code.	Already completed

Action criteria codes are listed in the 'Important information' section below.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

On the 19 April 2022 Officer ROSE attended site at 09:55. Weather was dry, and temperature was approximately 13 degrees Celsius.

Officer ROSE met with Lorraine CARTER, Branch Manager. We proceeded to walk around the site, throughout the inspection we were joined by other members of staff responsible for the three teams within the business. Medical, Pest Control and Washrooms.

Officer ROSE was taken to the rear of the premises where vehicles enter via security gates and arrive at the designated parking bays. There was a bin storage area next to the vehicle washing bay.



Photo 1 – vehicle washing bay alongside bin storage area

There are daily collections from Veolia that for non hazardous offensive wastes that are unloaded from vehicles and placed into RoRo secure skips. During the inspection an operative was unloading Tiger bags i.e. yellow and black coloured bags during the visit from one of the fleet vehicles and placing the bags into the RoRo Veolia skips.

The layout of the premises meant that there are clear boundaries between each respective function pest control, washroom and medical.



Photo 2 – view of premises operational area showing washroom section of business.

ACTION:

Update current site map to reflect the current boundaries of each section pest control, washroom and medical.

Deadline: 3 months

Washrooms

Due to changes within the business, there are no longer washing machines installed on the premises. The plastic bin unit washing machine was used to thoroughly clean the sanitary bins, since the COVID-19 pandemic most of sanitary bins for customers are kept on site. There is still an exception for which some bins are removed and these are cleaned in the sink area.

Pest control

This section appeared to be tidy, and the stores were behind a locked gate. We did not enter this area as it could be seen from outside that everything appeared to be stored neatly.

Medical

These areas appeared to be clean and adequately stored away from other non-hazardous waste streams.

Clinical wastes are collected by Stericycle daily and the number of bins can vary depending on the amount brought back to site.

Offensive wastes are collected by Veolia daily, and these are identifiable from other waste streams. Several empty bins were being stored outside which were empty and awaiting collection.



Photo 3 – empty bins awaiting collection

The Hazardous Waste (Wales) Regulations 2005

The current registration CAW844 should be used for all wastes collected at the premises. There were consignments for clinical waste collected by Stericycle that did not incorporate the six digits premises code.

This was going to be raised internally and in due course please ensure that all hazardous wastes collected from this premises are using the CAW844 premises code. As an example, a consignment note code collected from this site would be CAW844/56789.

Update: 21 April 2022 – Lorraine CARTER emailed to confirm that Regional SHE Manager had contacted one of the companies to inform them of the premises code.

Update: 29 April 2022 – Natasha SMITH sent a copy of the consignment of the wastes collected on 28 April 2022 incorporating premises code.

Thank you for making these adjustments.

ACTION:

Ensure all hazardous wastes removed from the site are assigned the registered premises code.

If you have any issues with this report, please contact Jak Rose on 07866 157281 or email

jak.rose@naturalresourceswales.gov.uk.

Thank you.

In this document 'Natural Resources Wales' means the Natural Resource Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) Order 2012

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

What are suspended scores?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry and Waste action criteria (used in section 1 and 2):**A: Permitted activities**

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. 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 our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.