

Compliance Assessment Report for: CAR_ NRW0039664

Permit number	ZP3933NJ	Operator name	The Treatment Hub Limited
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Site name	The Treatment Hub Limited
Site address	Building 2, Westfield Industrial Park, Waunarlwydd, Swansea, SA5 4SF
Type of assessment	Inspection

Date of assessment	22 nd March 2022
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Parts of permit assessed	Section 2 Operations
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NRW Lead officer	Liane Bacon-Weekes	Accompanied by	Gary Evans
Report sent to – Name and position	Mr. Simon Farr	Date issued	4 th April 2022

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

Part of permitted activity assessed (use action criteria below)	Assessment result	Permit condition
C3 General management – Materials acceptance	C2 Significant	2.3.1
B4 Infrastructure – Containment of stored materials	C3 Minor	1.1.1, 2.1.1 & 2.3.1

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded
2

2. What action is required?

Criteria	Action needed	Complete by
C3	You are required to reduce the volume of waste on site to 5,250 tonnes as authorised by the Environmental Permit. Prior to removal, you must classify the waste in accordance with <i>Guidance on the classification and assessment of waste (1st Edition v1.2 GB) Technical Guidance WM3</i> and HWR06 <i>Classifying and coding wastes from physio-chemical treatment facilities</i> .	Action overdue
B4	You are required to remove the waste located on the unmade ground and remediate the area. You are also required to ensure waste is enclosed in accordance with the permit to prevent further breaches.	3rd May 2022

Action criteria codes are listed in the 'Important information' section. If the operator considers that they are unable to comply with any of the actions noted above, or to the deadlines specified, they must contact NRW immediately.

3. What will happen next?

You are non-compliant with your permit. We will be considering taking enforcement action against you for the non-compliance recorded above in due course.

4. Details of our assessment

An inspection was undertaken on the 22nd March 2022. The purpose of the inspection was to make a visual assessment of waste volumes and storage at the facility.

Person(s) Present

David Slater (The Treatment Hub)

Phil Rees (PR) (Consultant to The Treatment Hub)

Liane Bacon-Weekes (LBW) (Natural Resources Wales)

Gary Evans (GE) (Natural Resources Wales)

Permit Compliance Assessment

During the inspection it was evident that the volume of waste stored on site remained in excess of the permitted limit of 5,250 tonnes as listed in the Operating Technique Application supporting document SOL0113ESP01. Storing more than this specified limit is a breach of condition 2.3.1. NRW have attributed a compliance score of *C2 Significant* under the C3 action-criteria heading (*General management – Materials acceptance*).

Photographs evidencing the volume of waste.



Action: See section 2 of this report.

During the inspection it was found that metal sheets were missing from the side of the building. This has allowed waste to spill out onto unmade ground located outside the building and beyond the permit boundary.

Photographs highlighting this are provided below:



As specified in the Operating Techniques (SOL0113ESP01) and the Environmental Management System (EMS) the installation boundary does not extend beyond the building, and all materials are to be treated and stored internally. It also notes that all materials are to be stored on an impermeable surface and away from the building's drainage system. Waste stored outside the building is not located on the appropriate surface or within the permit boundary.

NRW considers the escape of waste onto unmade ground and beyond the permit boundary is a breach of permit conditions 2.1.1, 2.3.1 and 1.1.1 NRW have attributed a compliance score of *C3 minor* under the B4 action-criteria (*Infrastructure – Containment of stored materials*).

Action: See section 2 of this report.

The Root cause of the listed permit breaches have not been explored as part of this assessment.

Whilst the partial suspension notice has limited the acceptance of waste, as the holder and operator of the permit you are still required to manage and maintain the facility to an appropriate standard to comply with permit conditions.

End of section 4

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 in the aspects assessed.
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

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

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.