

Compliance Assessment Report CAR_NRW0040106

Permit being assessed: CB3398ZF.

For: Forward Waste Management East Moors Road Hazardous Waste Transfer Station,
held by Forward Waste Management Ltd
At: 122-128 East Moors Road, Cardiff, CF24 5EE.

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

On 22/06/2022 between 10:30 and 12:00.

Parts of permit assessed: Site Inspection

NRW Lead Officer: Dale Padfield, accompanied by Geraint Harris, Mostyn Wall.

Report sent to: Rachael Hughes , Hazardous Transfer Station Manager on 12/07/2022.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
B4 - Infrastructure - Containment of stored materials	Action only (X)	

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
B4	Repair damaged sections of concrete.	31/07/2022

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

Forward Waste Management Limited

EPR/CB3398ZF

This compliance assessment report details the site visit conducted on 22nd of June 2022.

The primary purpose of this compliance visit was to conduct a brief site inspection which served as an opportunity to view the site before it became operational and to introduce the regulatory officers to the site personnel.

Natural Resources Wales (NRW) officers Dale Padfield, Geraint Harris and Mostyn Wall arrived at the Forward Waste facility at 10:30 on the 22nd of June 2022. Introductions were made with various Forward Waste management along with the managing director. The managing director gave a brief overview of the sites business plan along with an overview of the work the site had conducted to bring the new installation to an operational standard.

Inspection of the new installation began with a brief visual inspection of the yard area. The tanker loading / offloading area was observed to be in good condition. A 26,000-litre subsurface tank serves this area as a means to capture any unintended spills or leakages. The site surface water drainage system is controlled via a two penstock valve system, with the valves closed during operating hours, ensuring no polluting material will escape via the site drainage.

The outside storage areas for various waste types were observed. As operations had not yet begun there was no waste being stored on site. The entire site is surfaced with an impermeable concrete hard standing. However, NRW raised concerns over the damaged patches of concrete observed in the area outside the drum crushing unit. The damaged sections could provide a pathway for spillages or leaks to escape the confines of the site and contaminate the ground water and soil below. These concerns were raised on site and Forward Waste staff stated that repairs would be scheduled with the contractor who was expected to return in the following weeks.

Action 1: Forward Waste Management Ltd 12th July 2022. Forward Waste Management Ltd to have the damaged sections of concrete repaired and to provide NRW with conformation when this has been completed. Due 31st July 2022.

Contained within the Forwards Waste Management Ltd preventative maintenance plan is the following section on the *‘Condition and integrity of the impermeable concrete hardstanding’*

“Site Chemist / Senior Site Chemist to perform weekly checks of impermeable concrete hardstanding and record any defect on check sheet (ISO Form 0524). This is then reported to the Line Manager (Technical Manager). Any defects found are then reported to the FWM Engineering team for repair. The daily check sheets are stored in hard copy format within file ‘Facility checks’. Defects found, which may have a potential environmental or safety risk will result in the area being prohibited from use until such faults are rectified.”

Action 2: Forward Waste Management Ltd 12th July 2022. Please confirm that the area with the damaged concrete will be prohibited from use until the repairs have been conducted, as indicated by the

preventative maintenance plan. Due 15th July 2022.

The internal storage area was observed, the hardstanding throughout appeared to be in good condition. The system for the storage bays was explained. With the utilisation of interchangeable hazard identification signage, allowing the bays to be utilised in a flexible manner to meet business needs. The visit concluded with a brief viewing of the on-site laboratory and short discussion. Forward Waste stated that operations would commence the following week, but they were taking a phased approach, receiving only small quantities of waste to begin with. Once established, the facility planned to increase deliveries over the coming months. As discussed, a site inspection will be scheduled in the coming months, to view the site under operational conditions.

END.

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.