

Compliance Assessment Report CAR_NRW0040131

Permit being assessed: AB3090CC.

For: Argoed Farm AD Facility, held by Derwent Renewable Power Ltd

At: Argoed, Trefeglwys, Caersws, Powys, SY17 5QT.

Type of assessment carried out: Site Inspection, Reason: Incident Response (Incident number 2204322).

On 13/07/2022 between 11:00 and 15:30.

Parts of permit assessed: All

NRW Lead Officer: Malcolm Dines, accompanied by Julia Lloyd.

Report sent to: Roger Hughes, Director on 04/08/2022.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
A1 - Specified by permit	Assessed (A)	
B3 - Infrastructure - Site drainage engineering (clean and foul)	C2 Significant	2.4.1
B3 - Infrastructure - Site drainage engineering (clean and foul)	Action only (X)	
B3 - Infrastructure - Site drainage engineering (clean and foul)	Action only (X)	
B4 - Infrastructure - Containment of stored materials	C3 Minor	3.2.3
B5 - Infrastructure - Plant and equipment	C4 No impact	2.1.2
C1 - General Management - Staff competency/training	C3 Minor	1.1.4
C2 - General Management - Management system and operating procedures	C2 Significant	1.1.1
C2 - General Management - Management system and operating procedures	Action only (X)	
C4 - General Management - Storage, handling labelling and Segregation	Action only (X)	
D1 - Incident Management - Site security	Action only (X)	
E3 - Emissions - Surface water	C2 Significant	3.2.1
E3 - Emissions - Surface water	Action only (X)	
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	C3 Minor	1.1.2
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	C3 Minor	4.2.2
G4 - Monitoring and Records, Maintenance	Action only (X)	

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
and Reporting - Reporting and notification to Natural Resources Wales		

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

Total number of non-compliances recorded	Total non-compliance score
8	109.1

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
B3	Submit a full report into the site drainage by a third-party drainage specialist, including a detailed the site drainage plan. The report must also detail how the site drainage will be improved to be fully compliant with your permit so that clean and foul drainage is full segregated and that in the event of any spill, leak or failure in this area, the spilled material can be contained and recovered. This will then be assessed and a subsequent deadline for the completion of the work will then be agreed	30/09/2022
B3	Ensure that you have adequate pollution prevention procedures and equipment in place that, in the event of a spill, leak or failure, no polluting matter will enter the clean water drainage system. This is an additional action required due to the above breach of permit condition 2.4.1	03/08/2022
B3	Ensure that all effluent from the feedstock clamps is fully contained and discharges to the dirty water system and that the impermeable pavement at the site is fit for purpose and prevents the transmission of effluent to groundwater. This breach is consolidated under the breach of permit condition 2.4.1	31/08/2022
B4	Ensure that all polluting matter is stored securely and that liquids are provided with adequate secondary containment.	03/08/2022
B5	Ensure that the bleed-valve system (as well as all plant and equipment at the site) is constructed and maintained as designed and to the manufacturers requirements.	31/08/2022
C1	Ensure that the site has a suitably qualified Technically Competent Manager. Submit a copy of Mr. Hughes' Continuing Competency certificate, or if he does not pass the assessment employ a suitably qualified manager.	12/08/2022
C2	Review and revise EMS to ensure that the site is managed to prevent, or if that is not possible, to minimise pollution of the environment. You must refer and follow the NRW Guidance, "How to Comply with your Environmental Permit". How to comply with your environmental permit.pdf . Submit the revised EMS to NRW for review	31/10/2022

Criteria	Action needed	Complete by
C2	Due to site accepting buttermilk from a creamery on The Gower, both the liquid and dried digestate produced by the AD process is classed as waste. Therefore you must ensure that all digestate is spread in accordance with an environmental permit and that you comply with the waste Duty of Care. This breach is consolidated under the breach of permit condition 1.1.1	03/08/2022
C4	Provide a reasonable timescale by when you will be able to create physical separation of wastes in the Reception Building that prevents feedstock (chicken manure) and final output (dried digestate) from mixing. This breach is consolidated under the breach of permit condition 1.1.1	31/08/2022
D1	Improve security at the site to prevent unauthorised access. This will be risk-based, but must include the following: - Records of people entering and leaving the site - Keeping the gate to the field from the lower yard closed and locked. - Always keeping the control room locked when the site is unattended. This breach is consolidated under the permit breach of condition 1.1.1	03/08/2022
E3	Prevent all point-source emissions to water	03/08/2022
E3	Provide a timescale by when the clean-water drainage system will be fully cleaned to remove the risk of contaminated water discharging to the watercourse. This must be before 30 September 2022. This is an additional action required due to the above breach of permit condition 3.2.1	12/08/2022
G2	Ensure that all records required by the permit are kept correctly. You must keep records to demonstrate that you are operating and managing the activities in compliance with your management system. Use your management system to explain what records you are going to keep and where they will be held. Then make sure you keep the relevant records up to date.	03/08/2022
G4	Ensure that all records required by the permit are kept correctly. You must keep records to demonstrate that you are operating and managing the activities in compliance with your management system. Use your management system to explain what records you are going to keep and where they will be held. Then make sure you keep the relevant records up to date.	31/10/2022
G4	Submit a permit variation to update the registered office address on the permit of Derwen Renewable Power Ltd	30/09/2022

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.

You are non-compliant with your permit.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

This compliance visit was carried out by Malcolm Dines and Julia Lloyd following a pollution incident reported to Natural Resource Wales (NRW) on 15th June 2022 and two subsequent incident response visits where the operator was not present.

The weather was dry, sunny and warm. Officers met with Roger Hughes, the owner and TCM for the site who accompanied the officers for part of the visit and how met with the officers before they left the site. A full assessment of the site was undertaken.

Permit Breaches

B3 - Site drainage engineering (clean and foul) - Cat 2; Permit Condition 2.4.1

You have been given this category 2 breach under the above condition because during the inspection it was identified that the surface water drains in the yard where the digestate dryer is and where waste acceptance and collection activities are carried out are connected to the clean water drainage system. This means that in the event of a leak, spill or other failure, material cannot be contained and recovered and will discharge to surface water. During this visit you stated that when the gearbox in the separator broke in August 2021 and the sump pump failed, digestate entering these drains was the cause of the pollution incident in September 2021. Photographs taken during the investigation into that pollution show an umbilical pipe connected to the digestate collection valve in that yard with a plume of digestate leading to one of the clean water drains. On 5th July 2022 during a visit investigating the pollution on 15th June 2022, a vacuum tanker with an umbilical pipe connected to the liquid digestate sump was parked over one of the clean water drains (as shown in the photograph below).



Digestate is a highly polluting substance and therefore it is reasonably foreseeable that undiluted digestate entering a watercourse will cause a significant pollution and so this breach has been scored accordingly. You must ensure that any polluting matter spilled at the site cannot enter the clean water drains and that the clean and foul drainage at the site is fully segregated.

Following NRW's site visits, it is clear the site drainage and impermeable pavement has not been constructed in accordance with the site design plans submitted with your permit application, or the amended version on the wall of the control room.

Action – Submit a full report into the site drainage by a third-party drainage specialist, including a detailed the site drainage plan. The report must also detail how the site drainage will be improved to be fully compliant with your permit so that clean and foul drainage is full segregated and that in the event of any spill, leak or failure in this area, the spilled material can be contained and recovered. This will then be assessed and a subsequent deadline for the completion of the work will then be agreed. **By 30 September 2022**

Action - Ensure that you have adequate pollution prevention procedures and equipment in place that, in the event of a spill, leak or failure, no polluting matter will enter the clean water drainage system. **With immediate effect**

B3 - Site drainage engineering (clean and foul) - Action Only; Permit Condition 2.4.1

During the inspection it was identified that the channel drains across the front of the feedstock and digestate storage clamps were damaged and were failing to contain effluent from the material stored in the clamps (as shown in the photograph below). Effluent was escaping from the channel drains and travelling under the concrete surface of the yard before emerging next to the and entering the clean water drain in the centre of the yard. This means that undiluted silage effluent and digestate was discharging directly to the watercourse below the site. It was also possible, by standing on the concrete, to make the impermeable pavement between the clamps and the drain move which indicates that the concrete may be damaged and no longer prevents the transmission of effluent to groundwater.



Along the southern wall of the clamps there is a perforated pipe placed on the concrete apron that falls back to clamp preventing the transmission of liquids off the concrete. This pipe is buried in gravel and effluent discharges to the "clean yard" in front of the clamps. The effluent then drains without any containment to the field to the south of the site, as well as across the "clean yard" to the bunded tankfarm and then enters the drain which is controlled by a diverter valve (as shown in the photograph below). This system does not fully contain effluent from the feedstock clamps and this must be contained by the dirty water system at the site.



As there was a relatively small quantity of effluent entering the watercourse and draining to ground due to the failure of the containment system it is reasonable foreseeable that this breach will result in a Category 3 breach, which is consolidated under the above Category 2 breach of the same permit condition.

Action – Ensure that all effluent from the feedstock clamps is fully contained and discharges to the dirty water system. **By 31 August 2022.**

Action - Ensure that the impermeable pavement at the site is fit for purpose and prevents the transmission of effluent to groundwater. **By 31 August 2022.**

B4 - Containment of stored materials - Cat 3; Permit Condition 3.2.3

You have been given this category 3 breach under the above condition because during our inspection it was observed that a drum of unlabelled oil with no containment was being stored on an area of yard served by clean water drainage.



You stated that the oil had come from the front loader that had broken and that the drum had been overfilled. This drum had first been seen when the site was visited on 5 July 2022 (as shown in the photograph above) and there had been no attempt to clear the spill or move the drum since then. The drum was in a part of the site where there are a significant amount of vehicle movements and was not protected from collisions.

Additionally drums of oil for the Gas Engines are stored on a wooden pallet in the waste reception and collection area. Drums of oil, or any other polluting matter must be stored securely and with adequate secondary containment. Drums must either be stored with a bunded area or container, or on a bunded pallet. It is reasonably foreseeable that the drum of used oil could be knocked over and, due to the proximity of the clean water drain, oil would enter the watercourse below the site.

Action – Ensure that all polluting matter is stored securely and that liquids are provided with adequate secondary containment. **With immediate effect.**

B5 - Plant and Equipment - Cat 4; Permit Condition 2.1.2

You have been given this category 4 breach under the above condition because during the compliance visit it was observed that the bleed-valve for the digestate pumping system is not constructed or maintained to the manufacturers specification (as shown in the photograph below).



Currently a temporary plastic pipe is fixed to the bleed-system by gaffer tape and the system is bled into the IBC. The system was being bled at the time of the inspection, this is because the pump that moves digestate from the digester tank to the separator is worn and air is getting into the system. Due to the temporary and poorly constructed nature of the system, effluent was being sprayed onto the floor of the bunded tankfarm, as well as onto equipment and pipes around the area of the bleed-valve. You stated that the reason you have this system is because the pipe used to send material to the buffer tank, needs to be moved to the other side of the pump so that less digestate is bled from the system along with the air. There is little risk to the environment from this breach as any spills are contained in the bunded area behind the diverter valve, as long as the diverter valve is managed correctly. If future compliance visits identify that the diverter valve is not being managed correctly then breaches identified within the bunded tankfarm may be given a higher compliance score.

Action – Ensure that the bleed-valve system (as well as all plant and equipment at the site) is constructed and maintained as designed and to the manufacturers requirements. **By 31 August 2022**

C1 - Staff competency/training - Cat 3; Permit Condition 1.1.4

You have been given this category 3 breach under the above condition because the site

does not have a suitably qualified Technically Competent Manager. Roger Hughes is the sole Technically Competent Manager and although he has an appropriate qualification, he has not taken his Continuing Competency assessment which was required before 21st August 2020. You have been reminded several times of this requirement. In the Compliance Report CAR_NRW0039498 it states that you were reminded on 7th January 2022 about the requirement and failed to carry out this requirement for which you received a Category 3 breach of permit. You also failed to comply with the action set in that Compliance Report, to book a Continuing Competency test and submit the certificate to NRW by 18th March 2022.

It is reasonably foreseeable that the failure to have a suitably qualified manager at the site could result to a significant pollution of a watercourse, especially when digestate is such a high risk to the aquatic environment. It is also reasonable to consider that not having a qualified Technically Competent Manager is the, or a, root cause of all the other permit breaches identified in this compliance report. It is noted that Mr Hughes has booked to undertake his Continuing Competency assessment before the end of July 2022.

Action - Submit a copy of Mr. Hughes' Continuing Competency certificate, or if he does not pass the assessment employ a suitably qualified manager. **By 12 August 2022.**

C2 - Management system and operating procedures - Cat 2; Permit Condition 1.1.1

You have been given this category 2 breach under the above condition because the Environmental Management System (EMS) for the site is inadequate and it is reasonable to consider that this is a root cause of the other permit breaches identified on this CAR form. Your EMS appears to be a generic user manual provided by the manufacturer that does not provide detail about the specific operation of the site. This can be seen clearly in Section 4.5.4 which relates to the drying of digestate and states, "If installed wet fibre is transported to the dryer hopper...". Drying is carried out at your site and so the EMS must reflect the activities that are carried out, as well as procedures for those activities and for the maintenance of the plant and emergency procedures.

The EMS states that the collection point for the digestate is, "...at the digestate store". However, the digestate collection valve is on the wall of the bunded tankfarm and collection is made from the yard where the separator and dryer are situated.

It has not been updated since the site started operating and refers to consultants and contractors no longer involved with the site. For example: Section 9.3 - Maintenance Support, refers to a contract with Marches Biogas. It is the understanding of NRW that Marches Biogas have not had any involvement in the site since the end of 2019.

The EMS does not contain any procedures for the operation of the diverter valve and how to prevent accidental discharge to the clean water drainage system. There did not appear to be any procedures for plant breakdown or maintenance.

There are no procedures for contractors to follow when collecting digestate from the site or for visitors to sign into the site or how to contain spills.

There is also no notice at or near the site entrance telling the public and those responding to an incident out of hours, about the nature of the site and who they can contact for further information, or who to notify if they have a concern. You must install a noticeboard that is

easily readable from outside the site in daylight hours and must include:

- the permit holder's name (company name at least)
- the operator's name if different (company name at least)
- an emergency contact name and the operator's telephone number
- a statement that the site is permitted by Natural Resources Wales
- the permit number
- Natural Resources Wales national numbers, 0300 0653000 and 0800 807060 (incident hotline), or any other number we subsequently notify you about in writing.

The lack of adequate written procedures for the operation, pollution prevention and emergency planning for the site has resulted in significant management and operational failings at the site. This has resulted in two significant pollutions of the watercourse below the site in the past 12 months. Compliance Report CAR_NRW0039498, dated 10th March 2022, contained a review of the previous Compliance Report (CAR_NRW0038728) that required you to carry out a review and update all the management system documents and provide electronic copies to NRW. You have now failed to comply with this action twice. Failure to comply with this action may result in NRW serving a notice and carrying out enforcement action.

Until now you have been classing the liquid and dried digestate produced at the site as non-waste and it has been spread to land by a contractor without a permit. Because you are accepting waste buttermilk from a creamery on The Gower it means that all digestate output from the process is waste and must be handled in accordance with the Environmental Permitting Regulations 2016 (as amended) which means that it can only be spread to land under an Environmental Permit and you must comply fully with the Waste Duty of Care. The failure to do so is an offence and if this happens NRW may take enforcement action against all parties involved.

Action – Review and revise EMS to ensure that the site is managed to prevent, or if that is not possible, to minimise pollution of the environment. You must refer and follow the NRW Guidance, "How to Comply with your Environmental Permit". [How to comply with your environmental permit.pdf](#) . Submit the revised EMS to NRW for review. **By 31 October 2022**

Action – Unless you stop accepting non-agricultural waste at your site, do not allow any digestate to be spread to land except under and in accordance with an Environmental Permit. **With immediate effect.**

C4 - Storage, handling labelling and Segregation - Action Only; Permit Condition

1.1.1

You have been given this category 3 breach under the above condition because during the compliance visit it was observed that in the Reception Building there is no separation between chicken manure feedstock and dried digestate to be spread to land (as shown in the photograph below). The chicken manure is brought in directly to the reception building and deposited on the floor to one side, while the dried digestate is blown into the building through the wall of the building from the drying process in the "Upper Yard". By not keeping these waste types separate you are allowing the dried digestate to be contaminated with the chicken manure. You must ensure that these waste types are always kept fully segregated. This is a Category 3 breach that is consolidated under the above breach of permit condition 1.1.1.



Action – Provide a reasonable timescale by when you will be able to ensure that there is physical separation of wastes in the Reception Building that prevents feedstock (chicken manure) and final output (dried digestate) from mixing. **By 31 August 2022**

D1 - Site security - Action Only; Permit Condition 1.1.1

You have been given this category 3 breach under the above condition because it has been identified that there is no security at the site. You must take a risk-based approach to decide the level of security needed on site to prevent unauthorised access and what is appropriate will depend upon the environmental risks posed by the activity itself and the location. Although the chance of vandalism at the site is low, in the event of an incident the risk to the environment from digestate escaping is very high. You stated during this site visit that you have measures in place at your adjacent poultry unit to prevent or minimise the impact of vandalism and so for this site you must consider that risk to exist and consider the appropriate security measures needed to prevent vandalism. Because for this site that could result in equipment damage and polluting liquids being released into rivers or onto the ground.

When NRW carried out an announced visit on 5th July 2022, the site was unmanned yet officers were able to access all areas of the site including the Control Room. Although the site is well removed from immediate public access, it was possible to drive into the site and walk around unchallenged on three occasions. It was also possible to access the site from

the watercourse to the south by walking through the gate next to the feedstock clamps. You must have a procedure for people arriving at the site to sign-in and during the latest site visit there were other unidentified contractors (unrelated to the AD plant) walking around the site and working in the control room which was also being used as a meeting room. You also confirmed that the site does not have a CCTV system.

You must review and revise your site security and include a written assessment of your control measures in your management system. This is a Category 3 breach that is consolidated under the above breach of permit condition 1.1.1.

Action – Improve security at the site to prevent unauthorised access. This will be risk-based, but must include the following:

- Records of people entering and leaving the site
- Keeping the gate to the field from the lower yard closed and locked.
- Always keeping the control room locked when the site is unattended

With immediate effect

E3 - Surface water - Cat 2; Permit Condition 3.2.1

You have been given this category 2 breach under the above condition because during our inspection it was observed that effluent was discharging into the watercourse from the clean water discharge point. Effluent from feedstock and digestate storage clamps is not being fully contained and is entering the clean water drainage system via drains on the yard between the storage clamps and the reception building. It is then discharging to the watercourse.

It was also noted that the pollution incidents in September 2021 and June 2022 were not the result of effluent from the storage clamps but were caused by digestate entering clean water drains on the "Upper Yard" where waste is handled. It has been identified that these drains are connected to the clean water drainage system. It is reasonably foreseeable that while these drains are still connected to the clean water drainage system, any effluent or digestate entering will discharge directly to the watercourse and result in significant pollution.

Because of the two pollution incidents, significant quantities of digestate will have entered the clean water drainage system. Any rainwater subsequently entering the clean water system will result in polluting matter being discharged to the watercourse. You must clean-out the clean water drainage system, including the retention tank under the "clean yard" area and provide a report of how this was done.

Action – Prevent all point-source emissions to water. **With immediate effect.**

Action – Provide a timescale by when the clean-water drainage system will be fully cleaned to remove the risk of contaminated water discharging to the watercourse. This must be before 30 September 2022. **The compliance for this action is to provide a timescale for the work by 12 August 2022**

G2 - Records of activity, site diary/journal/events - Cat 3; Permit Condition 1.1.2

You have been given this category 3 breach under the above condition because during our

inspection it was observed that you have failed to keep records of daily checks and the records of plant operations are incomplete. The failure to undertake and keep records of daily checks means that significant operational issues may not be identified. At present it is reasonable to consider that the failure to keep records correctly could result in minor harm to the environment. However, if you do not keep records as required and carry-out daily checks this may result in higher compliance scores in the future.

Action – Ensure that all records required by the permit are kept correctly. You must keep records to demonstrate that you are operating and managing the activities in compliance with your management system. Use your management system to explain what records you are going to keep and where they will be held. Then make sure you keep the relevant records up to date. **With immediate effect.**

G4 - Reporting and notification to Natural Resources Wales - Cat 3; Permit Condition 4.2.2

You have been given this category 3 breach under the above condition because you have not submitted any waste returns since Quarter 4 of 2019. You have been reminded to submit these returns on three occasions in Compliance Reports: CAR_NRW0037452 (dated: 08/02/2021); CAR_NRW0037894 (dated: 29/04/2021) and CAR_NRW0039498 (dated: 10/03/2022). The failure to submit all outstanding waste returns by the required date may result in NRW serving a notice to submit the notices. The failure to comply with a notice is an offence.

Action – Submit all outstanding waste returns for Calendar Years 2020, 2021 and 2022 (including Quarter 3 July to September) **By 31 October 2022**

G4 - Reporting and notification to Natural Resources Wales - Action Only; Permit Condition 4.3.4

You have been given this Action Only breach under the above condition because you have yet to vary your permit to update the registered office address of the business following the buy-out of the company in 2020.

Action – Submit the an application to vary the permit to update the company information as required by this permit condition **By 30 September 2022**

Other general observations/comments

With regards to non-compliances, please refer to Page 24 of “How to Comply with Your Environmental Permit” on what actions to take following notification of non-compliances.

Enforcement action for the pollution of the watercourse is being carried out as a direct breach of the Environmental Permitting Regulations 2016 under water quality legislation, rather than as part of site compliance. Please note that the failure to comply with the compliance actions set out above, especially with regards actions which are to prevent pollutants entering the watercourse, may result in NRW taking further enforcement action as a failure to comply with this compliance report.

In this document 'Natural Resources Wales' means the Natural Resources 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.