

Compliance Assessment Report CAR_NRW0040309

Permit being assessed: EP3994LG.

For: The Granary, held by Caerphilly Skip Hire (C W S) Ltd

At: Graddfa Road, Llanbradach, Mid Glamorgan, CF83 3QS.

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

On 23/08/2022 between 10:00 and 11:00.

Parts of permit assessed: Various

NRW Lead Officer: Greg Gardner.

Report sent to: Mr. Alun Pitten, Technically Competent Manager / Owner on 30/08/2022.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
F5 - Amenity - Deposits on road	Action only (X)	
A1 - Specified by permit	Assessed (A)	
B4 - Infrastructure - Containment of stored materials	Assessed (A)	
B5 - Infrastructure - Plant and equipment	Assessed (A)	
C4 - General Management - Storage, handling labelling and Segregation	Assessed (A)	
D1 - Incident Management - Site security	Assessed (A)	
F1 - Amenity - Odour	Assessed (A)	
F2 - Amenity - Noise	Assessed (A)	
F3 - Amenity - Dust/fibres/particulates and litter	Assessed (A)	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	Assessed (A)	

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
F5	Remove any excess deposits on road to help assist in the mitigation of potential excess airborne dust. Ensure regular maintenance of excess road deposits is undertaken to minimise environmental impact as per your EMS.	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.

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

This report details the site visit made on the 23rd August 2022 to Caerphilly Skip Hire Ltd, Caerphilly, permit reference number EPR/EP3994LG.

NRW Officer Greg GARDNER attended the Caerphilly Skips Hire Ltd site at The Granary, Graddfa Road, Llanbradach, CF83 3QS for a routine site inspection at 10:00am. The weather was intermittent rain and reasonably mild which it had also been the previous day.

To remind the company following each visit Natural Resources Wales will produce a Compliance Assessment Report (CAR) detailing our comments from the inspection. If we substantiate reasonably foreseeable risks or actual impact to the environment, we can breach the business against your permit conditions which can affect your site banding and annual subsistence fees; this is scored on a Category 1 - 4 basis:

- 1 - Major, serious persistent and/or extensive impact on the environment/people/property
- 2 – Significant impact on effect on the environment/people/property
- 3 – Minor impact or effect on the environment/people/property
- 4 – A non-compliance which has no potential environmental effect

PERMIT HISTORY

See below extract from permit regarding variation history.

Status log of the permit		
Description	Date	Comments
Waste disposal licence no. 76 issued	17/06/93	Licence for non-hazardous waste transfer station issued to Mr Arthur Rees.
Permit transferred EPR/EP3994LG/T001 (formerly EAWML 30100)	13/11/09	Permit transferred in full to Caerphilly Skip Hire (CWS) Ltd.
Variation issued EPR/EP3994LG/V002	11/03/13	Regulator initiated variation to update the permit to modern conditions.
Variation application EPR/EP3994LG/V003	Duly Made 19/12/19	Operator led variation to: - Increase annual throughput from 22,500 tonnes to 74,999 tonnes - Add waste types - Extend the site - Allow the crushing and screening of inert waste using a slow speed crusher either on impermeable surfacing or hardstanding. - Allow the bulking up of bagged asbestos - Allow the shredding of wood outdoors on impermeable surfacing - Allow temporarily storage of waste in skips on concrete or hardstanding
Additional information received in response to Schedule 5 notice	03/06/20	Consisting of response document to Schedule 5 notice (PAN-008172 Schedule 5 Notice_CWS3) and updated: - Environment Management System (1960r2v2d0520EMS) - Environment Risk Assessment (1960r3v2d0520ERA) - Fire Prevention and Mitigation Plan (1960r4v2d0520FPMP) - Environmental Monitoring Plan (1960r5v2d0520 MON) - Noise and Vibration Management Plan (1960r6v1d0520 NOISE)
	29/06/20	Consisting of updated Environmental Monitoring Plan (1960r5v2d0520 MON) and query responses
	27/07/20	Consisting of updated Fire Prevention and Mitigation Plan (1960r4v3d0520FPMP)
Variation issued EPR/EP3994LG	27/07/20	Varied permit issued to Caerphilly Skip Hire (CWS) Ltd.

GENERAL OBSERVATIONS

Caerphilly Skips Hire Ltd (CWS Ltd), Caerphilly operate under a bespoke permit for a hazardous and non-hazardous waste transfer station for the crushing and screening of inert waste such as paper, cardboard, wood, glass, metals, plastics and construction and demolition wastes using a slow speed crusher either on impermeable surfacing or hardstanding. The site is also allowed the bulking up of bagged asbestos, shredding of wood outdoors on impermeable surfacing and also allowed temporarily storage of waste in skips on concrete or hardstanding. The maximum quantity of waste accepted and processed on site shall not exceed 74,999 tonnes per year. The site was operational at the time of site inspection.

SITE INSPECTION

The waste transfer station activities located on the 'top yard' were operating well and all incoming wastes following initial sorting were being stored in appropriate bays or sealed skips. All waste being stored on the 'lower' yard on site was being stored in sealed skips as per permit conditions and awaiting onward recycling/disposal. Housekeeping on site was in good working order with no concerns raised. The stockpile heights of waste streams were not in excess of the sites Fire Prevention and Mitigation Plan (FPMP) and stored in separate piles with adequate separation distances. On site drainage and surface infrastructure in good condition with no concerns raised by NRW Officers as seen in photos 1-4.

DEPOSITS ON ROAD

The amount of deposits on the road / main thoroughfare was raised with Mr. PITTEN. Although the deposits were not excessive and this is a working site, it was noticeable that further work could be done to help reduce the amount of road deposits which in turn would aid with the mitigation of excess airborne dust with reduced dust 'kick up' from lorries / heavy plant and machinery (see foreground of photo 1). Mr. PITTEN indicated that the onsite sweeper used to remove these road deposits had been loaned to another waste management company. NRW Officer Greg GARDNER advised Mr. PITTEN that it would be beneficial for this sweeper to be returned to CWS Ltd as soon as reasonably practicable to remove the excess road deposits. Mr. PITTEN indicated that the sweeper would be returned in approximately a couple of weeks time.



Photo 1 - On site waste transfer activities on the 'top yard'



Photo 2 - On site waste transfer activities on the 'top yard'



Photo 3 - On site waste transfer activities on the 'top yard'



Photo 4 - On site waste transfer activities on the 'bottom yard'

ACTION: Remove any excess deposits on road to help assist in the mitigation of potential excess airborne dust. Ensure regular maintenance of excess road deposits is undertaken to minimise environmental impact as per your EMS.

Discussions took place on site with Mr. Alun PITTEN regarding a recent complaint reported to NRW (WIRS 2205752) regarding excessive dust and noise issues. Mr. PITTEN outlined that due to the recent hot and dry weather access to water was limited resulting in limited use of the dust suppression system however, CWS Ltd have now installed a large water tank to house a significant amount of water for fire fighting and dust suppression purposes.

With regards to excessive noise issues, the vast majority of the noise emanating from the site was located on the 'top yard'. There was numerous heavy machinery present operating but not creating excessive noise when treating waste such as heavy machinery buckets scraping the floor, excessive revving of engines or wastes being dropped at excessive heights. Caerphilly County Borough Council are also investigating this issue from a Local Authority standpoint.

Whilst on site, NRW Officer Greg Gardner did not witness any significant airborne dust or excessive noise levels that were of concern however, as per photos 1-4, the weather was intermittent rain which assisted the dust suppression at the time of the site inspection.

WASTE RETURN SUBMISSIONS

CWS Ltd have submitted their latest quarterly waste return for 2022 on time and in full. For quarter 2, 2022, the site received a total of 4,929 tonnes of waste with 4,864.14 tonnes of waste removed. There were no unauthorised waste streams identified within the submission.

NRW officer Greg GARDNER left site at 11:00pm the same day.

I look forward to working with the site in future.

If you have any issues with this report please contact Greg Gardner on greg.gardner@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.