

Compliance Assessment Report

Report ID:
CAR_NRW0034042

This form will report compliance with your permit as determined by an NRW officer

Site	Lamby Way Open Windrow Composting Facility	Permit Ref	AB3096CP			
Operator/Permit holder	Kelda Organic Energy (Cardiff) Limited					
Regime	Installations					
Date of assessment	25/09/2018	Time in	12:45	Out	13:20	
Assessment type	Audit					
Parts of the permit assessed	As detailed					
Lead officer's name	Griffiths, Toby					
Accompanied by						
Recipient's name/position	Ian Kemmery / Karl Pascoe/ Manager	Date issued	11/10/2018			

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
B1 - Infrastructure - Engineering for prevention and control of emissions	A	
B3 - Infrastructure - Site drainage engineering (clean and foul)	A	
C2 - General Management - Management system and operating procedures	A	
C3 - General Management - Materials acceptance	A	
F1 - Amenity - Odour	A	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	A	
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	A	

KEY: See Section 5 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,

O = Ongoing non-compliance, not scored.

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

Visit of 25th September 2018

Karl Pascoe – Site Manager

Ian Kemmery

1. Site overview

The 8 week composting process was explained by the contractors Freeland Ltd who operate the site on behalf of Welsh Water. Windrows of material were seen in differing degrees of decomposition depending on their progress through the site. The newer material is at the entrance, with the oldest material being at the opposite end.

Incoming material is tipped under supervision and undergoes waste acceptance checks to determine whether the waste is suitable or should be rejected. If rejected, the local authority is notified within an hour. A percentage of contamination is expected due to the variety of wastes collected in the green bins. This process was seen during the visit. Unsuitable wastes such as large plastic items, are physically removed prior to composting. Waste is then formed into a batch with a shovel loader. Photographic examples of rejected wastes were seen, which are used to train staff on waste acceptance procedures. Good records are retained on any rejected wastes, including composition and photographs of the waste in question. Rejection is based on both a percentage of inappropriate waste and the presence of any hazardous / problematic material.

The batches are moved down the site as they are physically turned over to ensure an even compost. Once the 8 weeks has passed, the material is graded, shredded and screened to be sent out as a product. The process is designed to follow the PAS100 quality protocol. Woody material is segregated then re-added to improve compost structure.

2. Records and permit limits

Each pile of material has a unique number for traceability and is monitored for moisture and temperature. The temperature probes were seen during the visit and ensure that waste is above 65C at 1m depth. Moisture is down via a physical squeeze test. Monthly calibrations (records seen) of the thermometer are based on comparison with a reference thermocouple, which is separately calibrated annually [#19/07/2018].

Good records are retained to ensure compliance with the PAS100 protocol which is audited separately by Organic Farmers and Growers and the NFU. This benefits permit compliance, which also requires detailed records. Site tonnages appeared to be within limits, with 6,500 tonnes on site currently. 119 tonnes was accepted the previous day. Last year, the total was reported to be 24,000 tonnes.

Recommendation: NRW recommends that a running total of waste tonnage is added to the

spreadsheet to enable an easier comparison with the annual waste tonnage limits.

The site is situated on a large concrete pad which drains into the centre to contain any runoff. This is then disposed of by DCWW. There was a mild compost odour on site which was not unpleasant to the officer.

3. Q2 waste returns

The waste returns were late, and DCWW were reminded to forward these on. [Now received on 10th October]

4. Permit transfer

The permit is still in the name of Kelda and needs to be transferred to Welsh Water. The permit transfer application was stated to be in progress.

5. Conclusion

There were no significant issues found during this visit. There is one recommendation made.

END

EPR Compliance Assessment Report

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Operator/Permit holder	Kelda Organic Energy (Cardiff) Limited	Date	25/09/2018

Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition. Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			

Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. 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 its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.