

Compliance Assessment Report CAR_NRW0040672

Permit being assessed: AB3191ZE.

For: Wastesavers Resource Centre, held by Wastesavers Limited

At: Wastesavers Resource Centre, Unit 6, Esperanto Way, Newport, Newport, NP19 0RD.

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

On 10/11/2022 between 11:20 and 12:45.

Parts of permit assessed: 1, 2, 3 and 4

NRW Lead Officer: Jak Rose, accompanied by Carla Curtis.

Report sent to: Ian Syms, Head of Operations on 15/11/2022.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
E2 - Emissions - Land and groundwater	C3 Minor	3.1.1
C2 - General Management - Management system and operating procedures	C3 Minor	1.1.1
B1 - Infrastructure - Engineering for prevention and control of emissions	Action only (X)	
B4 - Infrastructure - Containment of stored materials	Assessed (A)	
C1 - General Management - Staff competency/training	Assessed (A)	
C4 - General Management - Storage, handling labelling and Segregation	Assessed (A)	
D1 - Incident Management - Site security	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
2	8

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
E2	Ensure surface run off is controlled by not allowing water to migrate off site.	24/11/2022
C2	Increase frequency of drain maintenance to ensure blockages are removed to allow surface water to be drained. Update EMS to include a drainage maintenance section and service periods.	02/12/2022
B1	Improve the containment of surface water around site	31/05/2023

Criteria	Action needed	Complete by
	perimeter to prevent water leaving areas of surface water collection.	

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.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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 compliance report details the site inspection conducted by Natural Resources Wales (NRW) Officers on 10 November 2022 at: Wastesavers Esperanto Way, Newport NP19 0RD - Permit number EPR - AB3191ZE

Waste Regulation Officers Jak ROSE and Carla CURTIS arrived at 11:20 and met with Ian SYMS, Head of Operations. The last routine site inspection was completed on 12 June 2019. It was requested that an entire site walk around was undertaken. The weather conditions were cloudy with overcast conditions during the time of inspection.

Permit Breaches

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E2 Emissions – Land and groundwater - Cat 3; Permit Condition 3.1.1

You have been given the category 3 breach under the above condition because during our inspection Officers observed a significant amount of standing water leaving the yard area in the north side of the site. The water would normally collect via a drainage channel, this channel would then allow the water to travel towards the storage water attenuation and eventually into the interceptor before discharging.

The Operator said that due to the drainage channels being blocked and the significant rainfall recently there have been issues with the amount of standing water on the site. This has caused the surface water in **Photo 1 and Photo 2** (below) to remain on site and eventually be discharged off the ledge of hardstanding and onto unmade ground.

Photo 1 – water leaving hard standing and onto unmade ground



The permit does not allow any point source emission into surface waters or groundwater except clean, rainfall dependant drainage from areas of the site not used in connection with the storage and/or treatment of waste. The escape of water cannot be allowed to leave the site boundary.

ACTION: Ensure surface run off is controlled by not allowing water to migrate off site.

DEADLINE: 24 November 2022

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C2 Management system and operating procedures – Root Cause Breach
- Cat 3; Permit Condition 1.1.1

You have been given the category 3 breach under the above condition because Officers were informed by the Operator that the drainage channels were last maintained in May 2022. The Operator informed Officers the current system is not fit for purpose and difficult to maintain. Through root cause analysis this has been identified as a cause of the emissions breach which was the release of the water from the yard.

The engineering of the yard means that the surface water can be drained but in the event the channels become blocked there needs to be consideration within the Environment Management System (EMS) of how to contain the surface water on site effectively.

Your EMS must include a plan about how you will inspect and maintain your drainage channels and containment facilities.

Photo 2 – standing water in the yard due to blocked drainage channels



ACTION: Increase frequency of drain maintenance to ensure blockages are removed to allow surface water to be drained. Update EMS to include a drainage maintenance section and service periods.

DEADLINE: 2 December 2022.

B1 Engineering for prevention and control of emissions - Permit condition 2.3 - Action only

The consideration of measures such as bunds or other secondary containment measures must be tailored towards improving your site drainage infrastructure that will prevent pollution to groundwater outside of the site boundary.

ACTION: Improve the containment of surface water around site perimeter to prevent water leaving areas of hardstanding.

General Observations

Officers walked through the office reception where signing in took place. Officers were led to the conference room where introductions and an overall discussion took place regarding the site's recent activities.

Officers walked past the weighbridge and into the processing hall where there was baled aluminium and cardboard stored by the entrance in **Photo 3** (below). There also contained the picking line in which the mixed recyclables are segregated and picked by operatives.

The Operator invited Officers to walk up to the picking line and observe the conveyor of recyclables. Thank you for allowing us to look at the process and it was an awareness into the method used at the segregation stage of receiving mixed recyclables.

There were several skip bins on the western side of the site which contained a wastes such as WEEE and scrap metal.

Photo 3 – baled aluminium and cardboard stored within main building



The wastes above are within the 100 bales (50 tonnes) as specified within Fire Prevention Management Plan (FPMP)

Technical requirements - WEEE

Officers looked at some of the hazardous waste consignment notes for the WEEE 20 01 35*. The process in which the WEEE reaches the site is that it is first received at the Reuse Centre in Maindee, Newport. This site currently has a T11 waste exemption: repairing or refurbishing WEEE (**Registration number: EPR/21004T11**) Here they sort out the waste equipment into those that can be repaired and those that cannot. Once sorted they repair some items and dismantle the rest to be reused as parts.

Any items that are unsuitable are then sent onwards to this site at Esperanto Way. They are stored within sealed skips and sent to SIMS Metals.

Wastesavers use European Recycling Platform (ERP) as a broker during the consignment process. It was observed that there was no completed Part E of the consignment note. The Operator informed Officers that Wastesavers do not receive a completed consignment note once the WEEE is received at SIMS. This is received by ERP instead. It is a requirement that a copy of the completed consignment note must be sent to Wastesavers as you are the producers of the WEEE.

Waste Returns

These are up to date and correct. Thank you for submitting these on time at the end of

each quarter.

Technically Competent Manager (TCM)

Ian Syms has sent evidence of his continuing competence certificate which expires on 6 December 2023.

Thank you for your time and I look forward to working with the site in the future.

Officers signed out at reception and left site at 12:45.

If you have any issues with this report, please contact Waste Regulation Officer Jak Rose at jak.rose@cyfoethnaturiolcymru.gov.uk.

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.