Compliance Assessment Report CAR_NRW0040779

Permit being assessed: AB3132AH.
For: Moorland Environmental Ltd, held by Moorland Environmental Limited
At: Portmanmoor Road Ind Est, Cardiff, South Glamorgan, CF24 5HB.

Type of assessment carried out: Site Inspection, Reason: Routine.
On 30/11/2022 between 10:20 and 11:30.
Parts of permit assessed: Parts of Permit Assessed

NRW Lead Officer: Craig Coleman, accompanied by Magda Leonowicz.
Report sent to: Harry Scammell, Director on 07/12/2022.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
C1 - General Management - Staff competency/training	Assessed (A)	
C2 - General Management - Management system and operating procedures	Action only (X)	
C3 - General Management - Materials acceptance	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
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
C2	Action: Please update the sites Environmental Management System and submit a copy by 23/12/2022 via email to Officer Craig Coleman.	23/12/2022

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

Moorland Environmental Site Visit – (EPR/ AB3132AH) – 30/11/2022
Environment Officers Craig Coleman and Magda Leonowicz visited the Moorland Environmental facility at Portmanmoor Road Industrial Estate, Cardiff CF24 5HB on 30/11/2022 to undertake a routine site inspection that also served as a site visit for a cradle to grave audit undertaken by Officer Coleman on Moorland Environmental's duty of care process. Harry Scammell, a company director and the site technically competent manger was on site to meet us and discuss the site operations with us.

Up on obtaining their environmental permit Moorland Environmental held the lease on both Unit 43 Portmanmoor Road Industrial Estate, and Unit 44. Their permit boundary encompasses the boundary of Unit 43 but does not extend into Unit 44 which has only ever been used to store products that Moorland utilises in their operator or sell as part of their wider business. During our discussion on site Mr Scammell informed us that Moorland Environmental had given up the lease on Unit 44 and had consolidated their business solely into Unit 43.

Moorland Environmental holds an SR2008 No05 HCI waste transfer station and asbestos storage v7.1 permit. This allows them to store multiple waste codes, but Moorland Environmental's core business focuses on asbestos and as such the site only accepts 17 06 01*(Insulation materials containing asbestos) and 17 06 05* (construction material containing asbestos).

(C1) Staff Competency and Training:
Mr Harry Scammell is the current Technically Competent Manager for the Moorland Environmental. He works regularly from the site to comply with the requirement that Tier 2 Permits have a TCM on site for a minimum of 20% of the working week. Due to the site's offices moving from Unit 44 to Unit 43 Mr Scammell's WAMITAB level 4 certificate was boxed and unable to present it during the site visit. Mr Scammell has forwarded a copy of his continuing competence certificate which is valid through to 24/11/2023.

(C2) Management Systems:
The sites Environmental Management System was displayed in an easily visible location for all staff to have access to. The EMS does need to be updated to reflect the change in site operations, removing Unit 44 from the site outline.

Action: Please update the sites Environmental Management System and submit a copy by 23/12/2022 via email to Officer Craig Coleman.

(C3) Materials Acceptance:
Alongside this inspection Officer Coleman has undertaken an audit of the materials accepted at Moorland environmental Ltd from their production at site to their acceptance at Moorland and onward to their eventual disposal. All material accepted on site has been found to be compliant with those outlined in the environmental permit held by Moorland Environmental.

(C4) Storage, Handling, Ladling & Segregation:
At the time of the site visit, Moorland Environmental were storing 9 skips on site. 8 were large roll on roll off skips and one was a Maxi skip. All the skips were in good condition and well maintained.




98
1
84





(D1) Security:

The site benefits from 7ft railings that surround the site. The site also has a CCTV system that is monitored off site by a third-party company when the Moorland Environmental is closed.

Craig Coleman

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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.

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.