

Compliance Assessment Report CAR_NRW0040980

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 16/01/2023 between 10:00 and 10:30.

Parts of permit assessed: Various

NRW Lead Officer: Greg Gardner.

Report sent to: Mr. Mike Jones, Technically Competent Manager / Owner on 24/01/2023.

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)	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)	
F5 - Amenity - Deposits on road	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?

No action required.

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 16th January 2023 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 dry, sunny and reasonably cold 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 during the inspection as seen in photos 1-3.



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'

The previous site inspection on 23/08/22 (details found in site inspection report CAR_NRW0040309), outlined noticeable on site road deposits which would generate dust 'kick up' from lorries / heavy plant and machinery which resulted in an environmental complaint to NRW (WIRS 2205752) and possible future environmental complaints. Following the 23/08/22 site inspection, the site implemented mitigation measures such as on site street sweeper undertaking regular road cleaning as well as more frequent use of the on site dust suppression system. Following this, no further dust complaints have been reported to NRW. Please note, during the inspection on the 23/08/22, The UK was experiencing an period of extreme hot and dry weather and access to water was limited.

During this site inspection, the road deposits were minimal and no evidence of any airborne dust was present. See photo 4. Whilst on site, NRW Officer Greg Gardner did not witness any excessive noise levels that were of concern. Site security was in good working order with newly installed security fencing as well as any contained materials stored correctly within secured areas. Plant and equipment were in good working order with no visible defects witnessed such as oil leaks / unusual sounds etc.



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

CONTINUING COMPETENCY

According to the waste return submission, the principle TCM (Technically Competent Manager) for the site is Mr. Michael JONES. The date of expiry for the continuing competency is entered as 09/02/23. As a reminder, please ensure the principle TCM is enrolled on a continuing competency course such as a WAMITAB or EUSKILLS to ensure continuing compliance with your environmental permit under section 1.1.4.

WASTE RETURN SUBMISSIONS

CWS Ltd have submitted their latest quarterly waste return for 2022 on time and in full. For quarter 4, 2022, the site received a total of 9,712 tonnes of waste with 9,679.18 tonnes of waste removed. For 2022 in total, the site received a total of 29,589.8 tonnes of waste with 29,348.37 tonnes of waste removed. There were no unauthorised waste streams identified within the submission.

NRW officer Greg GARDNER left site at 10:30am 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.