

Compliance Assessment Report CAR_NRW0040852

Permit being assessed: NP3998FA.

For: Glan Yr Afon Civic Amenity Site, held by C B Environmental Ltd

At: Glan Yr Afon Industrial Estate, Llanbadarn Fawr, Aberystwyth, Ceredigion, SY23 3JQ.

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

On 15/12/2022 between 14:45 and 15:35.

Parts of permit assessed: Waste acceptance, Litter, Containment, TCM, Site Records

NRW Lead Officer: Gillian Coates.

Report sent to: Peter MALVERN, TCM on 17/02/2023.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
F3 - Amenity - Dust/fibres/particulates and litter	Assessed (A)	
C3 - General Management - Materials acceptance	Assessed (A)	
C1 - General Management - Staff competency/training	Action only (X)	
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	Assessed (A)	
B4 - Infrastructure - Containment of stored materials	C3 Minor	3.1.3 and Schedule 1 Operations Table S1.1

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
1	4

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
C1	Submit copy of latest WAMITAB competence certificate for NRW records and ensure any subsequent certificates are provided when renewed	28/02/2023
B4	Cooking oil container and paint pots - place inside secondary containment. Lead acid batteries - container cracked at base and requires replacement to ensure any spillage would not leak.	28/02/2023

Criteria	Action needed	Complete by

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.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

Gillian Coates (Waste Regulation Officer) visited the Glan Yr Afon Civic Amenity Site site unannounced to inspect the activities taking place under Environmental Permit NP3998FA. The weather conditions at the time of the inspection were very cold, dry, with frosty patches on the shady ground and visibility was good.

The Civic Amenity site was in operation during the inspection with a handful of vehicles on site. The Officer was accompanied on site initially by Davis Slotboom and later by Peter Malvern the TCM.

Condition of site

Your site was generally very tidy with no accumulation of spilt waste or windblown litter. There was no evidence of cross contamination of waste between the different skips and containers.



Site from entrance and perimeter with no accumulations of waste or litter evident

Materials Acceptance

The Officer observed collections containers for paint, textiles, cooking oil, asbestos, fluorescent tubes, fridges, garden waste, polystyrene, plasterboard, household batteries, lead acid batteries, WEEE whilst on site. All waste materials being accepted on your site were in accordance with your permit.



Polystyrene and WEEE containers

Staff Training and Competence

Copy of current WAMITAB certificate available to see onsite however there is not one on NRW files.

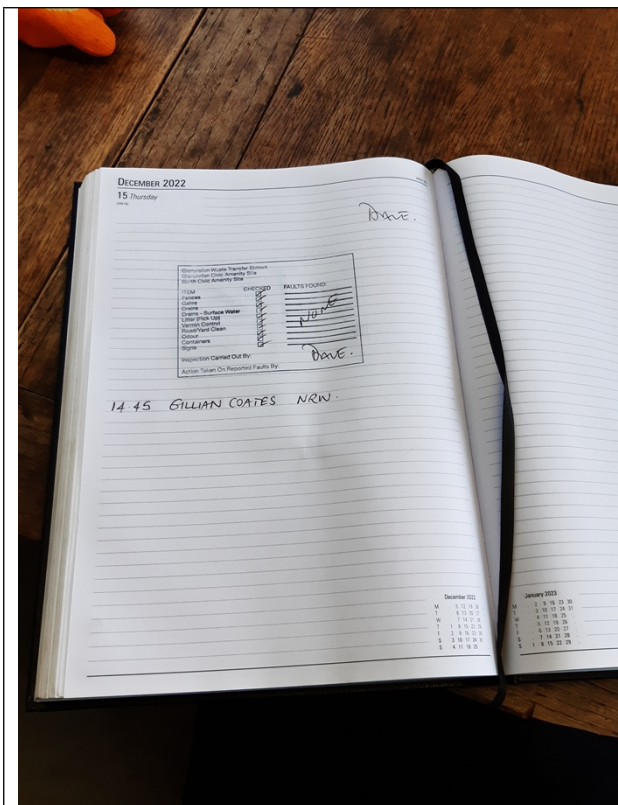


WAMITAB in file in site office

ACTION - Please send in a copy of your Competence Certificate by 28 February 2023 and ensure any subsequent competence certificates are submitted to NRW when renewed

Site Diary

The site diary was available in the site office and was up to date when checked. Site checklist was included in the daily diary and the activities ticked.



Site diary for 15 December 2023

NON-CONFORMITIES IDENTIFIED

B4 - Containment of Stored Materials - Permit condition Schedule 1 Operations Table
S1.1 - CCS Cat 3

Most waste materials were stored in appropriate containers however the Officer observed the following exceptions:

Paint - kept in open sided metal cages without secondary containment where paint could spill and leak onto site surface



Cooking oil - which was being kept on site in a single skinned container without secondary containment



Lead acid batteries - secondary containment provided was cracked at the base and would not contain any leaks or spillages



Your permit requires that liquids that could cause pollution shall be provided with secondary containment or other measures to prevent leakage from the primary container. Also your permit requires that batteries shall be stored in containers with an impermeable base. The paint, cooking oil and lead acid batteries were not contained on site in accordance with your permit and have been scored a Category 3 breach.

ACTION - Provide secure secondary containment for paint and cooking oil in accordance with 3.1.3 of your permit by 28 February 2023. Replace the lead acid battery container to ensure impermeable storage in accordance with Schedule 1 Operations Table S1.1 of your Permit by 28 February 2023.

Thank you for your time and cooperation with this inspection. If you have any enquiries with your CAR please email me gillian.coates@cyfoethnaturiolcymru.gov.uk

Regards,

Gillian Coates

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.