

## Compliance Assessment Report CAR\_NRW0041681

**Permit being assessed:** DP3099FV.

For: Mitchell Troy Household Waste Recycling Centre, held by SUEZ Recycling and Recovery UK Ltd

At: Mitchell Troy H W R C, Mitchel Troy, Monmouth, Monmouthshire, NP25 4HX.

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

On 24/03/2023 between 12:00 and 12:30.

Parts of permit assessed: Various

**NRW Lead Officer:** Carla Curtis.

**Report sent to:** Andrew Jones and David Stockbridge, Environment & Industrial Risk Manager and Site Manager on 17/04/2023.

### 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)      |                  |
| C1 - General Management - Staff competency/training                                                            | Assessed (A)      |                  |
| C2 - General Management - Management system and operating procedures                                           | Assessed (A)      |                  |
| C3 - General Management - Materials acceptance                                                                 | Assessed (A)      |                  |
| C4 - General Management - Storage, handling labelling and Segregation                                          | Assessed (A)      |                  |
| D1 - Incident Management - Site security                                                                       | Assessed (A)      |                  |
| D2 - Incident Management - Accidents, emergency and incident planning                                          | Assessed (A)      |                  |
| F1 - Amenity - Odour                                                                                           | Assessed (A)      |                  |
| F2 - Amenity - Noise                                                                                           | Assessed (A)      |                  |
| F3 - Amenity - Dust/fibres/particulates and litter                                                             | Assessed (A)      |                  |
| F4 - Amenity - Pests/birds and scavengers                                                                      | 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 24 March 2023 to SUEZ Recycling and Recovery UK Ltd located at Mitchell Troy HWRC, Mitchel Troy, Monmouth, Monmouthshire, NP25 4HX, permit number, EPR-DP3099FV.

NRW Officer Carla CURTIS attended for a routine site inspection at 12:00pm and was accompanied by Mr. Andrew JONES – Environment & Industrial Risk Manager and Mr. David STOCKBRIDGE - Site Manager. The weather conditions were mild and overcast with sunny intervals at the time of visit, there had been heavy rain on the previous day. The site was accommodating and cooperative during the site inspection

To remind the company following each visit Natural Resources Wales (NRW) 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 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 or 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

### GENERAL OBSERVATIONS

SUEZ Recycling and Recovery UK Ltd, Mitchel Troy operates under a bespoke permit as a Household Waste Recycling Centre (HWRC) for public use in the Monmouthshire area. This site is permitted to accept non-hazardous and hazardous wastes including Waste from Electrical and Electronic Equipment (WEEE). The total quantity of waste accepted at site shall not exceed 4,999 tonnes a year. The site is operational however on Mondays and Thursdays the site is closed for any maintenance / cleaning / removal of bins.

There was no waste stored outside of the designated permit boundary at the time of site inspection.

#### WASTE ACTIVITIES

All the waste storage containers were all clearly marked, and signage was in place to inform members of the public what each bin was for (as seen in photo 1). The site operates a booking system so there is usually a steady flow of traffic.

#### SITE INFRASTRUCTURE

The general housekeeping on the site was in good condition with no evidence of loose debris located on the floor. A regular cleaning regime is in place during most operational days and mainly on non-open days (Mondays and Thursdays) to maintain this standard. The infrastructure was in good condition with no evidence of damage (as seen in photo 3) and the on site interceptor drainage system was operational with no issues identified. The interceptor drainage system, is cleaned regularly. The site was secured with locked gates, high barbed wire fencing and floodlighting to prevent intruders and there is also 24 hour CCTV in operation. Stockpile heights of waste(s) were within compliance of the sites FPMP (Fire Prevention and Mitigation Plan). There were no offensive odours / noise observed during the site inspection.



**Photo 1** - Clearly labelled household waste skips



**Photo 2** - WEEE waste storage within interceptor drainage system area



**Photo 3** - Infrastructure was in good condition

#### TECHNICAL COMPETENCY

The site TCM (Technically Competent Manager) is Mr. David STOCKBRIDGE whos WAMITAB certificate expires 22/12/2024.

#### WASTE RETURN SUBMISSIONS

These appear to be up to date and correct, the total quantity of waste accepted at this site must not exceed 4,999 tonnes per year. Based on the submitted waste return data for 2022, the total waste accepted was

1457,31 tonnes which is within the sites annual threshold. NRW officer Carla CURTIS left site at around 12:30.

No permit non-compliances were identified on this visit and thus no breaches have been scored.

If you have any queries regarding this Compliance Assessment Report please contact regulatory officer Carla CURTIS via email at [Carla.curtis@naturalresourceswales.gov.uk](mailto:Carla.curtis@naturalresourceswales.gov.uk)

***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](mailto: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](mailto: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.