

Compliance Assessment Report CAR_NRW0041682

Permit being assessed: WP3599FY.

For: Five Lanes Transfer Station And H W R C, held by SUEZ Recycling and Recovery UK Ltd

At: Caerwent, Caldicott, Monmouthshire, NP26 3AY.

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

On 24/03/2023 between 13:00 and 13:45.

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	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)	
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?

Criteria	Action needed	Complete by
C2	Please review your Accident Prevention and Management Plan as a result of the fire on 27 March 2023 to include the installation of additional signage as a preventative measure to remind members of the public to remove batteries from all WEEE items prior to disposal	31/05/2023

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

This report details the site visit made on the 24 March 2023 to SUEZ Recycling and Recovery UK Ltd located at Five Lanes Transfer Station and HWRC, Caerwent, Caldicot, Monmouthshire, NP26 5PD, permit number, EPR-WP3599FY.

NRW Officer Carla CURTIS attended for a routine site inspection at 13:00 and was accompanied by Mr. Andrew JONES – Environment & Industrial Risk Manager and Mr. David STOCKBRIDGE - Site Manager. The weather conditions were mild and sunny 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, Five Lanes, Caldicot operates under a bespoke permit as a Household Waste Recycling Centre (HWRC) for public use in the Monmouthshire area as well as a waste transfer

station. This site is permitted to accept non-hazardous and hazardous wastes. The total quantity of waste accepted at site shall not exceed 74,999 tonnes a year. The site was operational during the site inspection. There was no waste stored outside of the designated permit boundary at the time of site inspection.

SITE INFRASTRUCTURE

The general housekeeping on the site was in good condition with no evidence of loose debris located on the floor (as seen in photo 1). A regular cleaning regime is in place during most operational days to maintain this standard. The flooring was in good condition with no evidence of infrastructure damage and the on-site interceptor drainage system was operational with no issues identified. The interceptor drainage system is cleaned / checked regularly. The site was secured and was of no concern at the time of site inspection.



Photo 1 - Site flooring infrastructure in good working order with no concerns over integrity

WASTE ACTIVITIES - HOUSEHOLD WASTE RECYCLING

The site had numerous skip containers (as seen in photo 2) which were all clearly identified with the correct labelling waste type to determine which waste would be placed in the correct skip container without confusion to members of the public. 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 2 - Clearly labelled household waste skips



Photo 3 Shows clearly labelled storage containers



Photo 4 Containers and bins all clearly labelled

WASTE ACTIVITIES - WASTE TRANSFER STATION

The site also houses a waste transfer station (as seen in photo 5) with numerous bays containing various waste streams ready for transportation for further processing. The housekeeping of the bays were in good working order with no causes for concern from an environmental / health & safety perspective. Again, 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. The site is closed on Wednesdays and Thursdays, the Reuse shop on site is open on Wednesdays.



Photo 5 - Waste Transfer Station section holding various waste streams

FIRE INCIDENT – 27/03/23

On 27/03/23 at 10:10am, the Fire and Rescue Service (FRS) reported an incident to NRW (WIRS 2302260) of a fire taking place at the Five Lanes Transfer Station. An NRW site officer was dispatched to this location to investigate. Upon arrival, the FRS confirmed to the site officer that the fire was in small waste electrical skip and had now been extinguished. The site officer ensured that all fire water run off was contained and captured within the sites sealed drainage system and was in the process of being tankered off site.

NRW Officer Carla CURTIS contacted the site following the incident to discuss with them their investigation of the incident. Following these discussions it was advised the site review their Accident Prevention and Management Plan to help prevent and or mitigate any future potential incidents.

Action Only: Please review your Accident Prevention and Management Plan as a result of the fire on 27 March 2023 to include the installation of additional signage as a preventative measure to remind members of the public to remove batteries from all WEEE items prior to disposal

SITE SECURITY

Site security was not an issue due to fencing located all around the property, there is also 24 hour CCTV in operation.

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 74,999 tonnes per year. Based on the submitted waste return data for 2022, the total waste accepted was 19,550 tonnes which is within the sites annual threshold. NRW officer Carla CURTIS left site at around 13:40

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

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.