

Compliance Assessment Report

Report ID:
CAR_NRW0034907

This form will report compliance with your permit as determined by an NRW officer

Site	Unit 11	Permit Ref	PP3739BK			
Operator/Permit holder	Sheild Environmental Services Limited					
Regime	Installations					
Date of assessment	02/04/2019	Time in	10:00	Out	12:00	
Assessment type	Audit					
Parts of the permit assessed	1.1, 2.3					
Lead officer's name	Taylor, Richard					
Accompanied by						
Recipient's name/position	Jenna Emmett/ HSE Compliance manager	Date issued	02/04/2019			

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
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KEY: See Section 5 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,

O = Ongoing non-compliance, not scored.

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

Shield Environmental

Permit PP3739BK

Site Inspection 2nd April 2019.

NRW carried out a site inspection to the Shield Environmental site in Tremorfa, Cardiff.

The inspection was risk based and focussed on the management system of the site as well as the systems in place for handling the waste types, (the who and the why).

No Non-Compliances were seen on the day of the Inspection.

Permit condition 1.1 – General Management.

1. The site is accredited to ISO 14001 certification. **Action – site to forward a copy of the latest certificate to NRW.**
2. The displaying of an Environment Agency certificate for registration under the Waste (England and Wales) regulations 2011 was queried because since 2013 NRW is the regulatory body for EPR A1 sites in Wales. The registering of the site through the Environment Agency is allowed because Shield's main operation is based in England.
3. Site has a capacity to temporarily store 50 tonnes of waste on site at any one time. The company runs a two-skip policy. Each skip is 35m³ in capacity and uses only one at a time. The other is kept as an immediate spare. This ensures that the capacity is not reached. The density of the 35m³ enclosed skips ensures that the net weight rarely exceeds 8 tonnes.
4. Control procedures are in place so that bagged waste is never opened on site.
5. A copy of the current permit is embedded in a working file and was seen to be handily placed. Electronic versions are available to site staff.
6. The site is part of a company-wide training matrix which ensures site staff are fully up to date and adequately trained. The Site manager's current WAMITAB certificate (CCC16906) was seen to be in date and meets the requirements of permit condition 1.1.2. Note, the current certificate expires after 2 years on 1st March 2020, and cover Transfer of hazardous wastes.

Permit Condition 2.3 – Operating techniques

1. EWC code 15 02 02 was not originally included in the site permit but has been accepted as being part of the waste codes necessary for site staff to be able to carry out their duties. This waste code applies to potentially contaminated overalls and PPE only from site staff.
2. The waste acceptance system was queried to ascertain at what point and by whom the EWC codes are applied to the waste. The site relies upon laboratory analysis of potential waste stream. The customer applies the relevant EWC code based on the lab results. The site accepts the waste and visually cross checks the waste to ensure this matches the description given. This system is not written or formalised as part of a management procedure but was found to be acceptable for this waste stream due to the hazard which would occur if alternatively, the waste was opened for visual inspection. Thus, all waste coming into the site is handled as the EWC code is described which satisfies the conditions of 2.3.3.
3. An example Waste transfer note was viewed on the day. The permit lays down criteria which the WTN must have as a minimum. This was cross checked.

- i. Nature and process producing the waste.
- ii. Composition
- iii. Handling requirements
- iv. Hazard identification
- v. Waste code

All the above criteria were satisfied by the system in place on site. Additionally the WTN carried a date, serial number and signature.

Site Tour

1. The site is a compact, fenced-off unit with a single-entry point. Security appears good, with cameras covering the area. No fence gaps or loose gaps were witnessed. No pests or vermin were seen. No noise, odour, uncontrolled wastes were visible. No invasive plant species were seen within the site boundary. The site was exceptionally clean and tidy. The cleanliness and tidiness of the site was seen as exemplary and a credit to site staff.

END.

EPR Compliance Assessment Report

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Operator/Permit holder	Sheild Environmental Services Limited	Date	02/04/2019

Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition.

Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			

Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. 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 its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.