

Compliance Assessment Report CAR_NRW0041913

Permit being assessed: MB3193HZ.

For: Stiens Skip And Recycling Facility, held by Stiens Haulage Ltd

At: Elba Crescent, Crymlyn Burrows, Swansea, SA1 8QQ.

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

On 01/06/2023 between 12:20 and 14:00.

Parts of permit assessed: A, B, C, D, F

NRW Lead Officer: David Morgan.

Report sent to: Craig Stiens, Technical Competent Manager on 02/06/2023.

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)	
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)	
F3 - Amenity - Dust/fibres/particulates and litter	Assessed (A)	
F5 - Amenity - Deposits on road	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

A routine site inspection was undertaken on Thursday 1st June 2023. The previous inspection was undertaken on 15th March 2022 and a non-compliance was recorded as copies of the Environmental Permit and Environment Management System were not available on site.

At the time of the inspection on Thursday 1st June 2023, present on site were David Morgan (Natural Resources Wales) and Robert Stiens (Stiens Haulage Ltd). Craig Stiens (Technical Competent Manager, Stiens Haulage Ltd) was on annual leave and not available during the inspection.

A site inspection was undertaken and the following observations were made:

Site Inspection

At the time of the inspection the weather was warm, sunny with little wind. A dust suppression system was in use and this appeared to be successfully mitigating any dust escaping site from the main pile of inert waste.

No dust was seen leaving site and the road directly outside the site was free from dust/deposits on the road itself. Generally, operations were assessed as not having an impact on the local amenity.

While on site, it was noted that Stiens are in discussion to purchase and utilise some adjacent land. should this come to fruition, please ensure an application is made to change the boundary of the area in your Environmental Permit.

In the previous inspection, an action was placed on Stiens to reinstate fencing on the boundary wall to the rear left of the site (upon entering site). This had not been completed by the time of the inspection, but as operations have been moved away from this area, and given the potential boundary change, it would seem more appropriate to review this at a later date. An inspection of the site boundary was undertaken and there was no waste escaping site and/or impacting the adjacent property.

Waste Storage

A skip of plasterboard (gypsum-based construction material) was being stored outside to the rear of the yard. Although the skip this material was stored in was sealed, it was an open skip and did not prevent ingress of rain water. This may impact the quality of the material and difficulties may arise in the onward removal/treatment of this material at other sites.

Plasterboard is not a specified waste in your Environmental Permit. Your Environmental Permit dictates that unless stored outside as a specified waste, then waste must be stored inside a building or in a secure container. You may wish to review storage practices in relation to plasterboard.

Environmental Permit & Waste Coding

Following an inspection of the yard, a request was made that the Environmental Permit, Environment Management System and Fire Prevention and Mitigation Plan.

At the time of the inspection, these documents were available on site, although, following a brief discussion regarding the contents of these documents, it was deemed that refresher training ('toolbox talks') be held. As with the previous inspection, staff on site had a good working knowledge of operational procedures, but refresher training would help all staff make the link between operating procedures and complying with the Environmental Permit.

It is recommended that training for all staff on site be undertaken at your nearest convenience. Training records will be requested in future inspections.

Summary & Next Inspection

No non-compliances with the Environmental Permit were recorded during the inspection of Thursday 1st June 2023. However, it is recommended that some in-house training be undertaken for all staff on site who have responsibilities to ensure compliance with the Environmental Permit.

Staff should understand how their role may influence compliance and they should understand the company's procedures for dealing with an environmental incident, accident or emergency.

It is likely, that in future inspections, Natural Resources Wales officers will request copies of training records and ask staff questions to ensure training is being routinely carried out.

Thank you for your time during the inspection.

END OF REPORT

Any compliance criteria not highlighted in the above summary should be considered as not assessed. In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resource Body for Wales (Establishment) Order 2012. You should note that the Natural Resources Body for Wales has been formed by bringing together the Countryside Council for Wales, Forestry Commission Wales and Environment Agency Wales. The Natural Resources Body for Wales has been empowered to exercise Welsh devolved functions since 1st April 2013 and has, generally, taken over the responsibilities of the Countryside Council for Wales, the Forestry Commissioners and the Environment Agency for Wales.

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.