

Compliance Assessment Report CAR_NRW0042080

Permit being assessed: SP3031SJ.

For: Cardiff Waste Management Resource Centre NRW/EPR/SP3031SJ/V002, **held by:** Biffa Waste Services Ltd

At: Curran Embankment , Riverside, Cardiff, South Wales, CF10 5FX.

Type of assessment: Report/Data Review,

Reason: Routine.

On: 05/07/2023.

Parts of permit assessed: FPMP.

NRW Lead Officer: Dale Padfield.

Report sent to: Alex Gee, Depot Manager, on 05/07/2023.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR3I - Emissions and monitoring - Fire	Assessed (A)	

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

Total 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

Biffa – Cardiff Waste Management Resource Centre

EPR/SP3031SJ

This compliance assessment report details a review of the fire prevention and mitigation plan (FPMP) submitted by Biffa in response to action one in CAR_NRW0040970. The FPMP was reviewed against Natural Resources Wales (NRW) guidance note 16 – ‘Fire Prevention & mitigation Plan Guidance – Waste management’. Below is a summary of the main points.

The FPMP details how non-hazardous waste stored on site will be managed and controlled to prevent the occurrence of fires and mitigate against the severity and environmental impact of a fire should one occur.

Quantities and waste types have been identified, including maximum quantities likely to be stored on site at any given time along with storage arrangements, storage locations, storage times and maximum stockpile sizes. All these parameters are compliant with the FPMP guidance.

Separation and fire break distances are not applicable as Biffa utilise engineered storage bays for waste storage. All waste is palletised or stored within IBCs and there is no storage of loose waste.

The site layout is well defined within the FPMP and provides adequate detail of storage arrangements and operations. Sensitive receptors, human and environmental, within a 1km radius of the site have been identified and a concise list of contact details is provided.

Prevention techniques have been well defined and include control of ignition sources and use of ATEX rated equipment where required, DSEAR assessment and fire risk assessment are in place. Daily inspections of stored waste to ensure no self-heating, electrical installations are subject to regular checks by competent persons. Hot works are controlled by a permit to work system to identify and minimise risk.

The site is well secured with security fencing, locked gate, with the premises protected by CCTV and buildings fitted with intruder alarms. Further to this the industrial estate is subject to its own 24-hour security.

Build-up of combustible wastes are controlled through daily house-keeping activities. Hot loads are rejected, any materials observed to be smouldering will be removed and placed in quarantine. Biffa have a dedicated emergency quarantine area; however, this is stated as being flexible and will be determined depending on the location of the burning material and the provision of access for the fire and rescue services (FRS). It is also stated that the quarantine area may be used as temporary storage location for the non-hazardous waste skip or WEEE skip, and that that this location will be kept clear of obstructions. Given the relatively small space available on site and procedures in place to make the quarantine area available, this is accepted.

Biffa have stated that given the relatively low quantities of combustible non-hazardous waste, no temperature or moisture checks are conducted. Biffa carry out visual and touch inspection to ensure no self-heating is occurring, this is accepted.

Provision for FRS attendance has been considered, including FRS response times, access to site, access to water and firefighting tactics, including in-hours and out of hours procedures. Control of firewater has been considered, the sites sealed drainage system would be utilised, along with sandbags along breakout points, particularly at the main entrance, to contain firewater within the site. Biffa have stated that this system will have limited capacity and Biffa tankers will be mobilised to remove firewater. Biffa may want to consider

assessing any drainage outside the site boundary to identify any surface water drains that may provide a pathway for escaped firewater. Knowing which drains are surface water or foul water may aid in preventing contaminated firewater from entering the environment.

Quantities of water required to extinguish a fire, based on the largest stockpile have been estimated and water availability has been confirmed. Weather conditions have been considered, including utilisation of wind data to indicate the direction of prevailing wind and the likely direction a smoke plume would travel.

Contingencies are in place to divert incoming waste to alternative Biffa treatment centres. Procedures for clearing and decontaminating the site are in place. Staff training is identified as well as monitoring, recording and record keeping, including triggers requiring the FPMP to be reviewed.

The guidance states that the FPMP should include a list of combustion products and emissions (to air, land and water) from the fire and emergency response and the likely impact on the community, infrastructure and environment. However, it's appreciated that Biffa accepts and stores a wide range of materials, with varying quantities and types stored at any given time, including hazardous and non-hazardous materials. As such, compiling a list of all combustion products would not be feasible, it be prudent to assume all emissions from the site during a fire would be detrimental to the receptors that Biffa have identified within the FPMP.

Notwithstanding the points raised above, the FPMP submitted by Biffa meets the requirements as listed within the FPMP guidance, any deviations have been justified. The FPMP is accepted.

END.

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.

If your assessment result in Section 1 is suspended, what does this mean?

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 compliance criteria (used in section 1 and 2):

1. Management

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2. Operations

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

3. Emission and Monitoring

- IR3A – Emissions to water, air or land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

4. Information

- IR4A – Records
- IR4B – Reporting
- IR4C – Notification

Enforcement response

Any non-compliance with a permit condition 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 twenty 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 to 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.