

Compliance Assessment Report CAR_NRW0042221

Permit being assessed: BB3998CQ.

For: Europest Environmental Services Ltd, held by EUROPEST ENVIRONMENTAL SERVICES LIMITED

At: Unit G, Trecenydd Business Park, Caerphilly, Caerphilly, CF83 2RZ.

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

On 11/07/2023 between 12:15 and 13:00.

Parts of permit assessed: 1, 2, 3 & 4

NRW Lead Officer: Jak Rose, accompanied by Greg Gardner.

Report sent to: Morgan Francis, Service Manager on 28/07/2023.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
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)	
E3 - Emissions - Surface water	Assessed (A)	
F3 - Amenity - Dust/fibres/particulates and litter	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 compliance report details the site inspection conducted by Natural Resources Wales (NRW) Officers on 11 July 2023 at Europest Environmental Services Ltd located at Unit G, Trecenydd Industrial Estate. Permit Number EPR- BB3998CQ. The last site inspection was on 15 September 2022.

Waste Regulation Officers Jak ROSE and Greg GARDNER arrived at Europest Environmental Services at 12:15. Officers met with the Service Director/Operator Mr. Morgan FRANCIS who was present throughout the visit. Access to the site is via the entrance gates to the Industrial Estate. The weather was fine and dry at the time of the inspection.

Site observations

Officers were accompanied to the yard at the rear of the premises where the industrial blue storage container (3m x 4m) is located. Within the container were three rigid bins, two of them were used to store offensive waste commonly referred to as tiger stripe bags. The remaining container was used to store sharps waste.



Photo 1 – industrial storage container located at the rear of the offices

There is an agreement in which Stericycle (SRCL) collect approximately 40 bags of clinical waste from the site on a weekly basis.

Officers were provided with copies of consignment notes which were checked while on site. These appear to be filled out correctly and with sufficient information in line with the Hazardous Waste Regulations (Wales) 2005.



Photo 2 – inside the storage container used to store wastes

The storage containers are a good measure for the purposes of containing the wastes. They are also padlocked which ensures no unauthorised access to the containers. Officers found no evidence of damaged or leaking bags. The containers inside the unit appeared to be in good condition with no signs of wear and tear.

The operational area itself is within a yard that has surface water drains. Spill kits were available within the container as was a maintenance log of when the operator completes their daily checks. During the time of inspection there were no concerns with how this was being managed in line with the sites EMS.

Permit surrender

Mr. FRANCIS informed Officers that the business will be relocating to another premises. A location has not yet been finalised; the Operator advises that the new location may have a similar layout with office space and the ability to store wastes on the premises.

To relocate the site operations, a surrender application would need to be submitted for the current permit.

Types of surrender:

- non-operational- surrender of a permit where operations have not started
- basic- where activities are inherently low risk. Applies only to some mining waste facilities and wastes deposited for recovery (SRPs only).
- low risk- where activities could in principle pollute land or groundwater, but the operator can show through records and pollution control measures that the legal surrender test has been met.
- normal- if none of the previous three options apply

As the site has been operational since January 2021 it would be eligible for either a low-risk

surrender or a full surrender only.

More information on the surrender can be found at: <https://naturalresources.wales/permits-and-permissions/waste-permitting/apply-to-surrender-give-up-all-or-part-of-a-waste-permit/?lang=en>

Please keep the regulating officer informed during the relocation process.

Officers left 13:00.

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.