

Compliance Assessment Report CAR_NRW0042499

Permit being assessed: BB3196CL.

For: Newtown Household Waste Recycling Centre, held by Sundorne Products (Llanidloe) Limited

At: Unit 4, Duffryn Industrial Estate, Newtown, Powys, SY16 3AJ.

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

On 20/09/2023 between 14:25 and 14:50.

Parts of permit assessed: 1.1.3; 2.2; 3.1.3; 4.2.2

NRW Lead Officer: Gillian Coates.

Report sent to: Kevin Pryce, TCM on 06/12/2023.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
C1 - General Management - Staff competency/training	Assessed (A)	
C3 - General Management - Materials acceptance	Assessed (A)	
C4 - General Management - Storage, handling labelling and Segregation	Action only (X)	
D2 - Incident Management - Accidents, emergency and incident planning	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	Action only (X)	

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
C4	Ensure that the lids for the fluorescent tube containers are in place when they are not in use.	15/12/2023
G4	Send in all of your quarterly waste returns using the correct permit number by Friday 15 December 2023. Ensure that you submit all future waste returns using the correct permit	15/12/2023

Criteria	Action needed	Complete by
	number within one month of the end of the reporting period.	

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.

You are non-compliant with your permit.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

Please note that this is an amendment to the original CAR form sent on 05/12/2023

NRW Hazardous Waste Officer Gillian Coates and Enforcement Apprentice Holly Dyke visited Newtown Household Waste Recycling Centre site to inspect the activities taking place under Environmental Permit BB3196CL which is a Standard Rules SR2008 No13 permit.

Weather conditions at the time of the inspection were overcast with showers and visibility was good.

The operator was not pre notified of the visit.

Officers were accompanied during the visit by Clive Jones, Site Supervisor in the absence of TCM Kevin Pryce who was unavailable at the time of the visit.

C1 - STAFF COMPETENCY/TRAINING - PERMIT CONDITION 1.1.3

In the site office we requested to see various documents which you are required to have available. The site permit, management system, and fire prevention and mitigation plan were all easily found and demonstrated compliance with Condition 1.1.3 of your permit.

The site diary showed evidence that the TCM had visited earlier that day and site checklists were completed up to date.



Photo showing daily checklist completed up to date

C3 - MATERIALS ACCEPTANCE - PERMIT CONDITION 2.2

All wastes stored on site were checked and were compliant with condition 2.2 of your permit.



Photo showing cooking oil storage

C4 - STORAGE, HANDLING, LABELLING & SEGREGATION - PERMIT CONDITION

3.1.3

Officers noted that the some of the containers holding the fluorescent tubes were left open. If one of the fluorescent tubes were to break the hazardous materials they contain would leak out onto the site.

ACTION - Please ensure that the lids of the fluorescent tube containers are in place when they are not in use



Photo showing fluorescent tube storage where container is uncovered

D2 - ACCIDENT, EMERGENCY & INCIDENT PLANNING

The spill kit was readily available, located where easily accessible and in good order.



Photo showing spill kit granules

F3 - DUST, FIBRES, PARTICULATES & LITTER

The site was very tidy and clear of any accumulation of litter including around the back of containers and the site boundary.



Photo showing no litter around hazardous waste storage container and boundary of site

Officers would like to thank you for your time and assistance with this visit.

Following the site visit checks were made on our records for your waste returns.

G4 - REPORTING AND NOTIFICATION TO NRW - PERMIT CONDITION 4.2.2

Our records showed that there were no quarterly waste returns for this site on file. Senior Waste Regulation Officer, Liz Park, emailed you to request that these are submitted urgently. The waste returns were sent in by yourselves with the incorrect permit number on them. The permit number used on the returns was for your previous site.

ACTION - Send in all of your quarterly waste returns using the correct permit number by Friday 15 December 2023. Ensure that you submit all future waste returns using the correct permit number within one month of the end of the reporting period.

If you wish to discuss your CAR please contact me at:

Gillian.Coates@cyfoethnaturiolcymru.gov.uk

In this document 'Natural Resources Wales' means the Natural Resources 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.