

Compliance Assessment Report CAR_NRW0043624

Permit being assessed: ZP3298FV.

For: Transfer Station, held by Carmarthen Recycling & Environmental Services Ltd

At: Johnstown, Carmarthen, Carmarthenshire, SA31 3RB.

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

On 21/02/2024 between 10:00 and 11:30.

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

NRW Lead Officer: David Morgan.

Report sent to: Julian Jones, Operator on 27/02/2024.

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)	
B3 - Infrastructure - Site drainage engineering (clean and foul)	Assessed (A)	
B4 - Infrastructure - Containment of stored materials	Assessed (A)	
C4 - General Management - Storage, handling labelling and Segregation	Assessed (A)	
C3 - General Management - Materials acceptance	Assessed (A)	
D1 - Incident Management - Site security	Assessed (A)	
F3 - Amenity - Dust/fibres/particulates and litter	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 Wednesday 21st February 2024. Present at the time of the inspection were: David Morgan (Natural Resources Wales) and Julian Jones (Carmarthenshire Recycling & Environmental Services Ltd).

During the last inspection by Natural Resources Wales, undertaken on 17th March 2023 with findings recorded in Compliance Assessment Report ref: **CAR_NRW0041597**, several non-compliances were recorded. These non-compliances were reassessed on Wednesday 21st February 2024 and the following observations were made:

Site Drainage & Infrastructure

The inspection on February 21st 2024 took place during a period of consistent heavy rain. Despite the recent high volume of rain, there was no significant ponding or pooling of water on site. Current infrastructure appeared to be maintained to a sufficient standard as to not have an impact on the local amenity (e.g. there was no surface water run-off escaping site).

In the last inspection (undertaken 17th March 2023), a non-compliance was recorded as a drain in the main waste reception building was blocked and unable to function. At the time of the inspection on 21st February 2024, drains were well maintained. Drain covers in the building were inspected and were free from debris. Generally, the waste reception area of the building appeared relatively dry and no surface water was leaving the building.

Materials Acceptance & Waste Storage

In the last inspection, it was noted that a skip of plasterboard was on site. Your Environmental Permit does not allow for the acceptance of this waste. You must amend your Environmental Permit to accept this waste. This waste was not viewed on site on 21st February 2024.

Further comment regarding this matter is contained below in the section titled '*Environmental Permit Variation*'.

All other wastes appeared to conform with the list of acceptable wastes as described in the Environmental Permit.

All other wastes were clearly separated, segregated and stored in compliance with the Environmental Permit. No wastes were stored in a manner likely to cause a pollution and/or impact the local amenity.

All wastes stored outside the building were done so within containers/skips.

Site Boundary & Amenity

An inspection of the site boundary was undertaken. The river level at the time of the inspection was high, but there did not appear to be any impact from operations in this

location.

Due to the nature of activities on site, it was acknowledged by the Operator that there is a potential for litter/waste to escape site. Waste/litter was not escaping site at the time, but there was a minor build up of litter in hedges behind the building, by the river. It was noted that consideration will be given to erecting netting on this fence which runs along the river.

Also, please continue to monitor surface water at all times. During periods of heavy rain, there is potential for surface water to run-off from the inert waste storage area and leave site. This area was inaccessible at the time of the inspection due to high level of the river, but please continue to monitor this area and ensure water does not run-off site.

Management Systems & Training

Copies of the Environmental Permit and Working Plan (now referred to as the 'Environment Management System') were made available on site during the inspection. We discussed the need for all staff on site to have access to these documents as in the event of an incident or emergency, staff will be available to assist with any incident response.

All site operatives should have knowledge of the Environmental Permit and how their role impacts compliance with the conditions of the permit.

It was agreed that staff would receive training via 'toolbox talks' on site. Records of this training will be requested by Natural Resources Wales in the next inspection.

Environmental Permit Variation

Your Environmental Permit (reference EPR/ZP3298FV) is an old style Waste Management Licence. Over the years, there have been several occasions where ambiguity has arisen over waste codes etc. partially caused by interpretation of the old style Waste Management Licence in view of developments in industry (e.g. introduction of EWC Codes into permits etc.).

It is recommended that you review your Waste Management Licence. An option you have would be to submit a Minor Technical Variation to vary the licence to a Standard Rules Permit for a Household, Commercial and Industrial Waste Transfer Station (with building). Further information regarding the Standard Rules Permits can be found on our website: [Natural Resources Wales / Waste standard rules and risk assessments](#).

Alternatively, you may wish to explore another type of variation, information on which can also be found on our website: [Natural Resources Wales / Waste permitting](#).

Summary

No non-compliances were recorded during the inspection on 21st February 2024. Several non-compliances recorded during the previous inspection, on 17th March 2023, had been rectified and those aspects of operations were assessed as compliant.

Operations were assessed as not having a detrimental impact on the amenity. Please monitor the potential escape of litter, waste and surface waters from site.

Your Environmental Permit does not allow for the acceptance of Plasterboard. To accept this waste type, you must vary your permit.

You may wish to consider undertaking a minor technical variation to change your permit to a Standard Rules Permit.

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.