

Compliance Assessment Report CAR_NRW0043687

Permit being assessed: XB3397TP.

For: Rhydeinon Civic Amenity Site, held by LAS Recycling Ltd

At: Rhydeinon, Llanarth, Dyfed, SA47 0QP.

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

On 27/02/2024 between 11:35 and 12:05.

Parts of permit assessed: See criteria listed below

NRW Lead Officer: Luke Taylor, accompanied by Gillian Coates.

Report sent to: LAS , Site Operator on 02/04/2024.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
C2 - General Management - Management system and operating procedures	Action only (X)	
C4 - General Management - Storage, handling labelling and Segregation	C3 Minor	1.1.1
B4 - Infrastructure - Containment of stored materials	Action only (X)	
F1 - Amenity - Odour	Assessed (A)	
F2 - Amenity - Noise	Assessed (A)	
F3 - Amenity - Dust/fibres/particulates and litter	Assessed (A)	
F4 - Amenity - Pests/birds and scavengers	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
1	4

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
C2	Review the site EMS to reflect the changes on site and provide a copy to NRW. Deadline 30/04/2024	30/04/2024
C4	Relocate the waste oil containers to within a suitable bund and label accordingly	30/04/2024
B4	Provide a sealed container for paint being deposited by householders	30/04/2024

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.

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

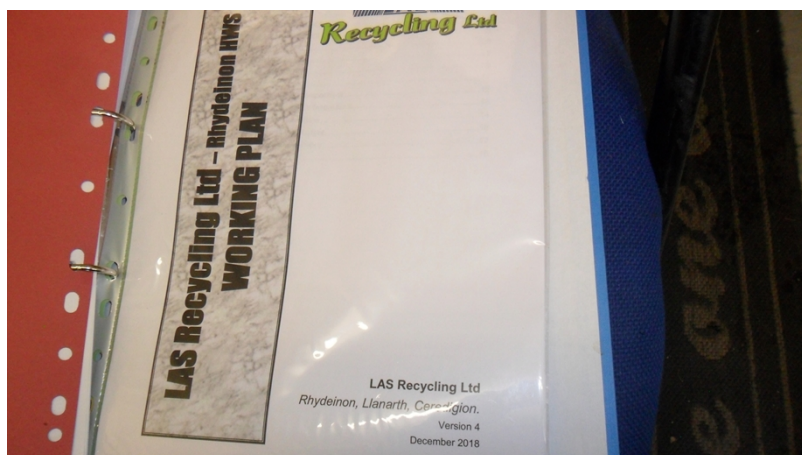
This Compliance Assessment Report is being produced following an unplanned inspection of Rhydeion Household Waste Recycling Centre. The inspection was conducted by Luke Taylor (Waste Regulation Officer) and Gillian Coates (Hazardous Waste Regulation Officer) of Natural Resources Wales.

The weather at the time of the inspection was bright but with light rain and no wind. The site was operational and officers were accompanied by the site operative.

C2 - Management System and Operating Procedures - Action Only

On arrival the officers signed the site diary and requested to view a copy of the site management system. From review, this was last updated in 2018, and contains a site plan which is no longer accurate, with some waste types now being stored in different locations. As per the guidance relating to Environmental Management Systems from NRW, the management system should be regularly reviewed to ensure it is appropriate and being implemented. The most recent guidance in relation to Management Systems can be found by following the below link:

[How to comply with your environmental permit \(naturalresourceswales.gov.uk\)](https://naturalresourceswales.gov.uk)



ACTION - Review the site EMS to reflect the changes on site and provide a copy to NRW. Deadline 30/04/2024

C4 - Storage, handling, labelling and segregation - Cat 3 - Permit Condition 1.1.1

You have been given the above non-compliance score as there were several waste

cooking oil containers on site, which were being stored without any secondary containment/bunds and which were not labelled. As per permit condition 1.1.1, Table 1, all skips, drums and tanks being used to store wastes shall be clearly labelled to identify the wastes stored within them. In addition, Section 2.2 of the most recent EMS for the site states under heading 'Site surface water management systems, impermeable pavements and sealed drainage systems' that liquid waste (waste oil) delivered by members of the public as household waste will be stored in a bunded tank. Please ensure that the oil container are moved to within a suitable bund and correctly labelled to identify their contents.



ACTION - Relocate the waste oil containers to within a suitable bund and label accordingly. Deadline - 30/04/2024

B4 - Containment of stored materials - Action Only

Paint deposited by householders was being stored within a sealed IBC on impermeable pavement, as required under your permit. However, the small area where paint was initially dropped off, before being moved by site staff to the IBC, consisted of an open sided plastic box, that would not contain any spillage. This was located on top of a small wooden table. Please ensure that this is replaced with a suitable container so that, if any spillage occurs prior to staff moving the containers to the IBC, it is contained and can then be disposed of appropriately.



ACTION - Provide a sealed container for paint being deposited by householders.

Deadline - 30/04/2024**Other Observations**

The site was in operation at the time of the inspection, with a steady stream of householders attending to deposit waste. There was very clear signage present attached to the perimeter fencing to identify the waste streams in each skip. No evidence of any litter was witnessed within the site, and the noise levels were low. The carriageway outside the entrance to the site was clear of any deposits.

If you wish to discuss the contents of this CAR, or have any queries in relation to its contents, please email: luke.taylor@cyfoethnaturiolcymru.gov.uk

Regards,
Luke Taylor

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.