

Compliance Assessment Report CAR_NRW0043985

Permit being assessed: DB3097HH.

For: Elis UK Limited, held by Elis UK Limited

At: Bulwark Trading Estate, Chepstow, Monmouthshire, NP16 5QZ.

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

On 07/03/2024 between 09:00 and 17:00.

Parts of permit assessed: Various

NRW Lead Officer: Chris Burge, accompanied by Jodie Baskerville.

Report sent to: Gary Youngson, Area Manager on 09/04/2024.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
W1A - Waste - Management - General management	Assessed (A)	
W2A - Waste - Operations - Permitted activities	Assessed (A)	
W2D - Waste - Operations - The site	Assessed (A)	
W2E - Waste - Operations - Waste acceptance	Assessed (A)	
W2C - Waste - Operations - Operating techniques	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

On Thursday 7th March 2024 Waste Regulation Officer Chris BURGE, Senior waste Regulation officer Jodie BASKERVILLE and Apprentice Mark O'GORMAN attended at Elis UK Ltd Bulwark Trading Estate, Chepstow, Monmouthshire CC, NP16 5QZ to conduct a first inspection of environmental permit DB3097HH, at the site we met with Gary YOUNGSON, Jason BELL, and Sean GOLDSWORTHY.

PERMIT OVERVIEW

This is a Tier 3 bespoke permit for a non-hazardous clinical waste transfer station. Treatment operations are limited to manual bulking up of permitted waste for the purpose of recovery only. Waste may be stored for recovery or disposal. Permitted waste types are non-hazardous non-infectious sharps, feminine hygiene products, nappies, and bandages, non-hazardous medicines and other separately collected non-hazardous bathroom waste. The maximum quantity of waste accepted and processed on site shall not exceed 1,000 tonnes per year. Waste must be stored and treated on impermeable surface with sealed drainage.

This permit does not allow any point source emission into surface waters or groundwater except clean, rainfall dependant drainage from areas of the site not used in connection with the storage and/or treatment of waste. There is no permitted discharge from the waste storage areas.

PERMIT INSPECTION

The area in which waste is being stored is a small area between two shipping containers with a roof covering, waste bins are stored on a sealed plinth to contain any potential loss of containment of water and / or contaminates. See photo one,



The site collects washroom waste which is stored for a short time before being taken away by a registered contractor. If the plinth that where the waste bins are stored on fill with any liquid these are then pumped out where the site has a lawful trade discharge with Welsh water. During the site inspection there were no offensive odours and / or excessive noise witnessed by NRW officers with housekeeping on site retained to a good standard. Site security was inspected with no issues identified with the operator.

The waste within the 4 wheelie bins is also bagged as seen in photo two.



These bins are locked when full until collected.

It was discussed during the inspection regarding changing the permit area of the permit to reduce the size but to include the proposed fire water run off location. This would need to be done via a formal permit variation. See below link to NRW website which contains further information regarding waste permit variations:

<https://naturalresources.wales/permits-and-permissions/installations/apply-to-vary-change-a-permit-for-installations/?lang=en>

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ACTION FROM INSPECTION

- Site is to complete a full drainage survey of the site showing all discharge points and ground water soak aways. This needs to be completed and sent to Waste Regulation Officer before the 31st May 2024

WAMITAB

A WAMITAB certificate is current at the time of the inspection and have been sent to the waste regulation officer and uploaded to the permit folder. The current WAMITAB holder for the site are Gary YOUNGSON, Jason BELL, and Sean GOLDSWORTHY

WASTE RETURNS

Waste returns for this permit are quarterly and need to be submitted prior to the deadline dates below.

Deadlines for submitting waste returns

Quarterly returns

Quarters	Deadline for return
January 1 to March 31	April 30
April 1 to June 30	July 31
July 1 to September 30	October 31
October 1 to December 31	January 31

CONTACT DETAILS

If you have any queries regarding this CAR form or to provide an update on any actions above, please contact me using the following details: Chris Burge, Waste Regulation Officer, chris.burge@naturalresourceswales.gov.uk, 03000 65 3904.

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.