

Compliance Assessment Report CAR_NRW0044031

Permit being assessed: LP3895FK.

For: Trehir Civic Amenity Site, **held by:** Caerphilly County Borough Council

At: Trehir Quarry, Pandy Lane, Llanbradach, Caerphilly, CF83 3RP.

Type of assessment: Site Inspection,

Reason: Routine.

On: 25/03/2024 between 10:40 and 11:15.

Parts of permit assessed: Various.

NRW Lead Officer: Carla Curtis, accompanied by Rhiannon Munro, Cerys Phillips.

Report sent to: Scott Jones, Ricky Vaughan, Waste Treatment and Disposal Supervisor, Waste Management Officer, on 16/04/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W1A - Waste - Management - General management	Assessed (A)	
W2A - Waste - Operations - Permitted activities	C3 Minor	3.1.3
W2E - Waste - Operations - Waste acceptance	Assessed (A)	
W2F - Waste - Operations - Technical requirements	Assessed (A)	
W3C - Waste - Emissions and monitoring - Odour	Assessed (A)	
W3D - Waste - Emissions and monitoring - Noise and vibration	Assessed (A)	
W4A - Waste - Information - Records	Assessed (A)	
W4B - Waste - Information - Reporting	Assessed (A)	
W4C - Waste - Information - Notification	Assessed (A)	

Result types are explained in more detail in the 'Important Information' section below.

Total 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
W2A	Please ensure that any future spills are cleaned up immediately and storage containers are not filled beyond their capacity.	Already completed

Compliance 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.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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 report details the site visit made on the 25 March 2024 to Trehir HWRC (Household Waste Recycling Centre), Permit number EPR- LP3895FK. Officers Carla CURTIS, Rhiannon Munro & Cerys Phillips attended site for an unannounced inspection at around 10:40, the weather conditions were cold, windy and it was raining.

GENERAL OBSERVATIONS

The site was fully operational and ~~was~~ busy at the time of the visit. Housekeeping was poor with many bags scattered around and books stacked on top of the recycling bins (see image 1). There were also broken lightbulbs and litter present next to the fluorescent tubes (see image 2) There were paint pots and bottle of oils stored outside of the sealed containers see (image 3 & 4) and oil that had spilled on the floor with no efforts being made to clear it up. The oil containers were also filled beyond capacity and were on the floor.



Image 1 – showing bags on the floor and books stacked on the bins.



Image 2 – showing broken bulbs and other litter.



Image 3 – Showing paint pots stored outside containers.



Image 4

Condition 3.1.3 of your environmental permit states;

"All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary

container. "

This is being scored a Category 3 Breach under W2A – Permitted activities

ACTION: Please ensure that any future spills are cleaned up immediately and storage containers are not filled beyond their capacity.

WASTE ACTIVITIES

All waste storage containers were clearly marked, and signage was in place to inform members of the public what each bin contained.

DRAINAGE SYSTEM

The drainage appeared to be working efficiently at the time of the inspection.

SITE SECURITY

The site has recently benefited from funding to improve the infrastructure on site. This has included a new welfare cabin, secure storage containers, updated CCTV and Fencing enhancements.

TECHNICAL COMPETENCY

The current TCM for the site is Scott Jones. The WAMITAB certificate expires February 2026.

WASTE RETURN SUBMISSIONS

These appear to be up to date and correct. The total quantity of waste accepted at this site must not exceed 75,000 tonnes per year. Based on the submitted waste return data for 2023, the total was accepted was 4750.41 tonnes which is within the site's annual threshold.

If you have any queries regarding this Compliance Assessment Report, please contact regulatory officer Carla CURTIS via email at Carla.curtis@naturalresourceswales.gov.uk

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.

If your assessment result in Section 1 is suspended, what does this mean?

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 Waste compliance criteria (used in section 1 and 2):

1. Management

- W1A – General management
- W1B – Energy Efficiency (MCP/SG facilities only)
- W1C – Avoidance, recovery and disposal of wastes produced by the activities

2. Operations

- W2A – Permitted activities
- W2B – Waste recovery plan
- W2C – Operating techniques
- W2D – The site
- W2E – Waste acceptance
- W2F – Technical requirements
- W2G – Improvement programme
- W2H – Pre-operational conditions

3. Emission and Monitoring

- W3A – Emissions to water, air or land
- W3B – Emissions of substances not controlled by emission limits
- W3C – Odour
- W3D – Noise and vibration
- W3E – Monitoring
- W3F – Pests
- W3G – Fire

4. Information

- W4A – Records
- W4B – Reporting
- W4C – Notification

Enforcement response

Any non-compliance with a permit condition 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 twenty 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 to 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.