

Compliance Assessment Report CAR_NRW0044484

Permit being assessed: EB3397TU.

For: JR Works, **held by:** Gavin Griffiths Recycling Ltd

At: Bryntywod, Langyfelach, Swansea, SA5 7LE.

Type of assessment: Site Inspection,

Reason: Routine.

On: 24/05/2024 between 10:20 and 12:00.

Parts of permit assessed: W1, W2, W3 & W4.

NRW Lead Officer: David Morgan.

Report sent to: Gavin Griffiths, Director, on 04/06/2024.

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	Assessed (A)	
W2D - Waste - Operations - The site	Assessed (A)	
W2E - Waste - Operations - Waste acceptance	Assessed (A)	
W3B - Waste - Emissions and monitoring - Emissions of substances not controlled by emission limits	Assessed (A)	
W3C - Waste - Emissions and monitoring - Odour	Assessed (A)	
W4A - Waste - Information - Records	Assessed (A)	

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

Total 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 Friday 24th May 2024. Present at the time of the inspection were: David Morgan (Natural Resources Wales) and Gavin Griffiths (Director, Gavin Griffiths Recycling Ltd).

During the inspection, compliance was assessed against several areas of operations and the following observations were made:

W3 - Emissions & Monitoring

Prior to entering site, an inspection of the local amenity was undertaken. Roads leading up to the site, where all site traffic travels to/from site, was free from mud and debris. The site accepts and processes large volumes of inert materials but access routes and surrounding highways were free from mud, dust and other debris.

At the time of the inspection, (morning of Friday 24th May 2024), there was no noticeable odour detected off site. The site accepts waste that has the potential to generate odours but at the time of the inspection this aspect of operation was assessed as compliant.

Generally, operations did not appear to be having a detrimental impact on the nearby amenity.

W2 - Operations

Site infrastructure was well maintained and appeared to be preventing the escape of waste off site. We discussed the area in the left corner (upon entering the yard, closest to the river) of the site. The site surface in this area naturally drains to this corner so it is important to routinely inspect and review site surface water management in this area during periods of heavy rain. At the time of the inspection, there was no rain and visually, it did not appear that water had been draining off site.

All waste on site was compliant with the list of permitted wastes in the Environmental Permit. All waste was stored in line with the requirements of the permit, notably, all plasterboard was stored inside the building, thus preventing rainwater ingress.

W4 - Information

Following an inspection of the yard, we discussed information and records related to the operation of the site. The Site Manager was present and when asked, could locate copies of the Environmental Permit, Environment Management System and Fire Prevention and Mitigation Plan. Copies of these documents are kept in offices just outside the site.

As these documents were available upon request, this item has been assessed as compliant, however, it is recommended that copies are kept at the weighbridge. In the event of an emergency/fire, it is highly likely that emergency services and site operatives will need access to these documents so for ease of access copies should be kept close to where operations are being undertaken.

We also discussed the need for refresher training or 'toolbox talks' so all operatives on site know where to find these documents in the event of an incident. Also, it is imperative that onsite operatives fully understand their roles and responsibilities in achieving compliance on site.

ACTION: Print copies of the Environmental Permit, Environment Management System and Fire Prevention & Mitigation Plan and keep copies at the weighbridge. Also, hold refresher training for all staff in relation to these documents.

Summary

Several aspects operations were assessed as compliant at the time of the inspection. No non-compliances with the Environmental Permit conditions were recorded. Operations were not having an impact on the local amenity and environment.

It was agreed that copies of documents related to operation of the site (Environmental Permit etc.) would be printed and kept at the weighbridge. It was also agreed that all staff would know where to find these documents and receive some form of refresher training in relation to their roles and responsibilities in relation to these documents.

Thank you for your time during the inspection.

END OF REPORT

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.