

## Compliance Assessment Report CAR\_NRW0044765

**Permit being assessed:** JP3698FK.

**For:** LAS Waste Ltd., **held by:** L.A.S. Recycling Limited

**At:** Tregaron Road, Lampeter, Ceredigion, SA48 8LT.

**Type of assessment:** Site Inspection,

**Reason:** Routine.

**On:** 02/07/2024 between 10:30 and 12:15.

**Parts of permit assessed:** FPMP, Site Infrastructure, Odour Mgmt.

**NRW Lead Officer:** Malcolm Dines, accompanied by Christopher Gilbey, Luke Taylor.

**Report sent to:** Danielle Parry, EHS Manager, on 26/07/2024.

### 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)	
W3C - Waste - Emissions and monitoring - Odour	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

This was a routine compliance visit carried out by Malcom Dines and Luke Bridge and accompanied by Chris Gilbey for training purposes. The officers met with Danielle Parry (Environmental and Health and Safety Manager), Lianne Timmerman (Technically Competent Manager) and Gareth Danter-Hill (Consultant). Mark Saunders (Director) joined us briefly during our walk around the site. The weather was dry and clear and there was little wind.

Although this compliance visit was already planned, Natural Resources Wales recently received a report of odour coming from the site and so part of this visit reviewed the odour management at the site, additionally there was also a need to review completed actions from the last compliance visit and also to review the Fire Prevention and Mitigation Plan.

While inspecting the Material Recovery Facility shed, it was seen that a fire door at the rear of the shed was open. The explanation for this was that the staff were on their break and use that door to go outside. The rear of the Materials Recycling Facility shed is at the perimeter of the site and backs onto Lampeter Industrial Estate and therefore closest to neighbouring properties. This building is going to be the main risk for odour production at the site and as the building is not enclosed, opening even a small door at the rear of the building will create a funnel effect and risk causing odour pollution. All doors in this building should be kept shut at all times unless in use. Following the compliance visit I walked around the perimeter of the site to Lampeter Industrial Estate and the rear of the Material Recycling Facility. The small door had been shut, but there was a slight noticeable odour. It is possible that some of this odour could be the odour suppressing agent that you are using in that building as I personally found it to be quite strong and not that pleasant a smell. However, although there was a noticeable odour, it was not at a level to consider that it caused a pollution.

Due to the location of your site, you need to ensure that you are managing your site in a way that minimises the production and release of odours at all times. Your priority must be to minimise the production of odours and not to rely on odour suppressing agents to manage odours from your site. You should also ensure that the dosing of the odour suppressant is not causing a noxious odour outside the perimeter of the site.

The surface of the lower yard has been resurfaced in concrete since the last compliance visit and the small gap in the wall between the site and the Afon Dulas has been filled and should prevent both the ingress of the river and the escape of any waste in the event of a flood.

Luke Taylor had reviewed the Fire Prevention and Mitigation Plan prior to the site visit and during this visit had a discussion with you about some minor additions to the plan. You provided copies of the engineering specifications for the concrete walls between the bays, which appear to comply with the current fire prevention guidance.

*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.

**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](mailto: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](mailto: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.