

Compliance Assessment Report

Report ID:
CAR_NRW0033676

This form will report compliance with your permit as determined by an NRW officer

Site	G Davies Skip Hire	Permit Ref	FP3898FK			
Operator/Permit holder	Glenville Davies					
Regime	Waste Operations					
Date of assessment	18/07/2018	Time in	11:50	Out	12:35	
Assessment type	Site Inspection					
Parts of the permit assessed	permitted area					
Lead officer's name	Davies, Eleanor					
Accompanied by	Davies, Gareth					
Recipient's name/position	Mark Davies/ TCM	Date issued	15/08/2018			

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
B1 - Infrastructure - Engineering for prevention and control of emissions	C3	2.1.1 Schedule 1 Table S1.1
B3 - Infrastructure - Site drainage engineering (clean and foul)	A	
C1 - General Management - Staff competency/training	A	
C2 - General Management - Management system and operating procedures	C3	1.1.1
C3 - General Management - Materials acceptance	C3	2.3.2(a)
C4 - General Management - Storage, handling labelling and Segregation	A	

KEY: See Section 5 for breach categories, suspended scores will be indicated as such.

A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,

O = Ongoing non-compliance, not scored.

Number of breaches recorded	3	Total compliance score (see section 5 for scoring scheme)	12
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If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

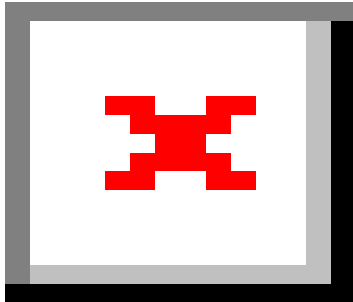
Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

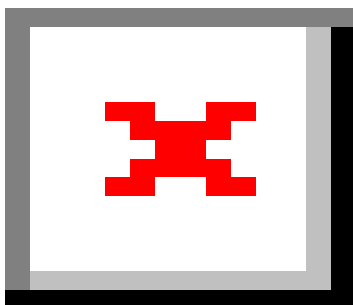
- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

Environment Officer Eleanor Davies and Senior Environment Officer Gareth Davies attended site to carry out a routine site inspection and to discuss a fire that had occurred on site on Friday 13th July. We were met on site by Andrea and mark Davies. Mark Davies accompanied us around site for the inspection.

B3 - GD environmental were on site at the time of inspection clearing out the drains and interceptor.

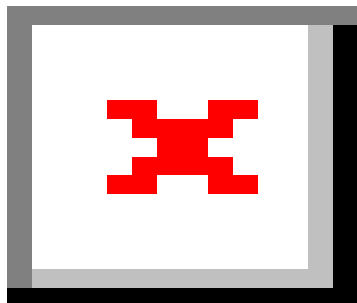


C1 - Mark Davies provided us with a copy of his continued competence certificate for our records. This is compliant with condition 1.1.4 of the permit which states The operator shall comply with the requirements of an approved competence scheme.



B1 - House keeping on site is poor. The site is muddy and the concrete pad / hardstanding has not be appropriately maintained in

places about the site. In particular there is a large, deep pothole on the concrete pad (see photo below) indicating that the impermeable pad has been compromised. This is a breach of condition 2.1.1 Schedule 1 table S1.1 which states that "All waste shall be stored and treated upon an impermeable surface with sealed drainage or hard standing. **CCS C3.** Please see C2 below for root cause assessment. Please ensure that such maintenance activities are carried out to ensure that the site remains clear of mud and debris and that the concrete pad is maintained to ensure its remains impermeable. **Deadline 29/08/18.**

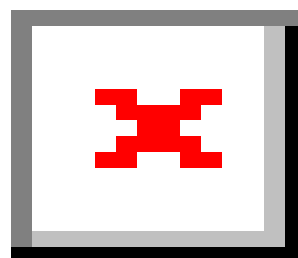
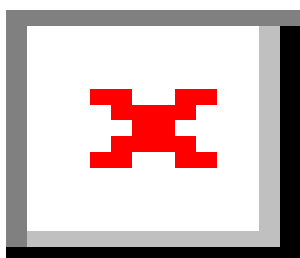


C2 - As stated above under B1, House keeping on site is poor. The site is muddy and the concrete pad / hardstanding has not be appropriately maintained in places about the site. In particular there is a large, deep pothole on the concrete pad. Part 5.1 of the current EMS states that "the impermeable pavement will be cleaned on a weekly basis to prevent the accumulation of loose waste and sediment...". Part 10 also states "The impermeable pavement is cleared every 3 months to allow for a thorough assessment of the concrete pad and drainage system". The current EMS for site was produced in 2008 and has not been updated since despite a number of changes occurring on site such as the installation of the picking line, noise abatement measures etc. This is reflected in the poor housekeeping on site. Please ensure that the EMS is updated and implemented appropriately across site. **CCS C3. Deadline 05/09/18.**

C3 - Waste fridges are being stored in the covered area to the left of the picking line. Waste fridges are classified as Hazardous waste and your permit does not permit hazardous waste to be stored on site (see condition 2.3.2(a) schedule 2 table S2.1 of the permit) and there are currently no waste exemptions registered to the site. Guidance on finding the appropriate waste code for waste fridges can be found at:

www.gov.uk/how-to-classify-different-types-of-waste/electronic-and-electrical-equipment.

Please ensure that all waste fridges are removed from site and / or an appropriate exemption is registered that covers the storage of these fridges.



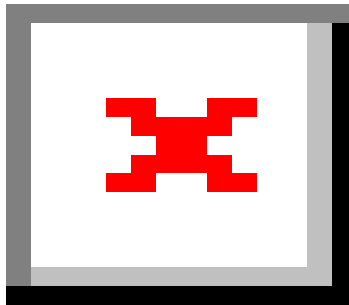
Waste tyres are being stored against the boundary wall at the front of the site. Waste tyres do not fall under the list of acceptable waste in schedule 2 table S2.1 of the permit and there are currently no waste exemptions registered at the site . Please ensure that the tyres are removed from site and / or an appropriate exemption is registered that covers the storage of these tyres.

CCS Score C3. Deadline 27/08/18

C4 - There are a number of bales of waste cardboard and waste tonne bags currently being stored on site. While their storage is

broadly compliant with condition 2.1.1 schedule 1 table S1.1 of the permit, there are a number of bales stacked down the side of the maintenance garage between two walls. This could pose a fire risk and storage here should be reassessed. As discussed on site, we will soon be carrying out an NRW led variation to your permit to include a condition requiring the production of a fire management plan. It would be advisable to begin considering how you can bring your site into compliance with the requirements of the Fire Mitigation and Management Plan guidance which can be found here:

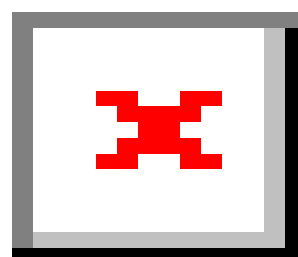
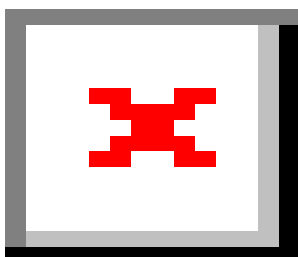
<http://naturalresourceswales.gov.uk/permits-and-permissions/environmental-permits/guidance-to-help-you-comply-with-your-environmental-permit/?lang=en>



FIRE ON SITE

Date 13/07/2018 Incident Reference 1804276

A fire broke out on site on the 13/7/18. It was discussed on site that this potentially started either in the waste being stored below the picking line, or on the picking line itself. The picking line belt then went on fire dripping down and setting fire to the waste in the bays below. The Fire Service were called and the incident dealt with relatively quickly with minimal damage caused. The burned belt and small quantities of burned waste material had been collected in a skip in order to be sent to landfill. It was recommended that Mark or Andrea check with the landfill they wish to send the burnt material to as they may require testing prior to leaving site to ensure it meets the waste acceptance criteria.



-----end of report-----

EPR Compliance Assessment Report

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Operator/Permit holder	Glenville Davies	Date	18/07/2018

Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition. Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			
C3	C3	Ensure the non-conforming waste materials are removed from site and no further accepted and / or a suitable exemption registered.	27/08/2018
B1	C3	Ensure the yard is appropriately maintained to ensure it is clean and the concrete pad is structurally sound.	29/08/2018
C2	C3	Ensure the EMS is updated and implemented across site.	05/09/2018

Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. 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 its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.