

Compliance Assessment Report CAR_NRW0045216

Permit being assessed: SP3031SJ.

For: Cardiff Waste Management Resource Centre NRW/EPR/SP3031SJ/V002, **held by:** Biffa Waste Services Ltd

At: Curran Embankment , Riverside, Cardiff, South Wales, CF10 5FX.

Type of assessment: Site Inspection,

Reason: Routine.

On: 20/08/2024 between 11:00 and 12:00.

Parts of permit assessed: Site Closure Visit / Waste Returns / Sewer Emissions Returns.

NRW Lead Officer: Dale Padfield, accompanied by Brigid Armstead.

Report sent to: -, Depot Manager , on 17/09/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
IR2B - Installations - Operations - The site	Assessed (A)	
IR3A - Installations - Emissions and monitoring - Emissions to water, air or land	Assessed (A)	
IR4B - Installations - Information - Reporting	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

Biffa Waste Services - Curran Embankment

EPR / SP3031SJ

The purpose of this compliance assessment report (CAR) is to:

- Detail the final / closure site inspection.
- Quarter two (April – June) 2024 waste returns.
- Emissions to sewer S1 January – June 2024 returns.

Site closure visit

Biffa have ceased operations at the Curran Embankment site (EPR/SP3031SJ), with all operations having moved to the new permitted site situated at Lamby Way (EPR/CB3394CM). A final site inspection was conducted on the 20th of August 2024, to confirm the cessation of operations, check the site has been returned to a satisfactory state, ensure all waste etc has been removed from the site and check the general condition of the site.

The following observations were made during the visit:

- All waste had been removed from site, all the associated waste storage and handling equipment had been removed from site. The site was effectively 'empty' with the only the storage bays and portable cabins (office block) remaining on site. Biffa stated that this infrastructure was left at the request of the landowner and would be moved / dealt with during the planned redevelopment of the site.
- Biffa stated the entire site had been subject to cleaning / jet-washing, evidence was provided by Biffa within the site condition report. The site was nominally clean, no visible waste remained on the site.
- The old drum crusher / diesel storage bay – A small quantity of diesel / oil was visible on floor within the bay and there was strong hydrocarbon odour within the bay. Biffa stated the bay had been steam washed several times, but some oil residue remained. All other bays appeared clean with no visible evidence of any contamination remaining.
- Condition of hardstanding – Generally good, however, multiple areas containing cracks were observed in the sorting yard, reception yard and within some of the storage bays. Some cracks appeared to likely only be superficial / surface cracking. However, in some areas the cracks appeared much deeper. The expansion joints in all areas appeared to have deteriorated, Biffa stated the last maintenance on these was possibly some 10 years ago, when the surfacing of the site was picked up in a CAR form. No maintenance undertaken on this aspect since.
One bay had a crack filled in with tar – this had been conducted recently (during 2024). Some of the

skip sorting bays had circular holes drilled into the floor - these were intended for electrical services, however as the plans never came to fruition, the electrical services were never installed. Biffa had attempted to dig into one of the holes (all appeared fill-in with debris / dirt) and stated that they think all the holes are 'blinded' and the horizontal routing was never installed. Pooled water was seen over one of the circular 'holes' possibly indicating that it was not providing an immediate pathway for any spilled materials to migrate off site. Some areas of pooled water on site indicating some retention capabilities remained in some areas of the site.

In principle, there is possible route for pollutants to escape / circumvent the pollution control measures on site due the poor condition of the impermeable surface in some areas. However, a structural / specialist engineer would be best placed to comment on the condition of the concrete surfacing and provide an evaluation on the integrity / severity of any damage and any implications on the water / pollution retaining properties of the surfacing.

There have been no recorded pollution incidents at the site, and the site has a good record of permit compliance.

Biffa have applied for a 'low-risk' surrender of the permit. The permitting team will make the final decision on whether this level of surrender is appropriate for this waste installation, based on the information submitted in the surrender application.

S1 – emissions to Sewer returns January – June 2024.

The S1 reporting form was received on time. The minimum and maximum pH values were within permitted levels for the reporting period. The returns are accepted.

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Quarter two – April – July 2024 Waste Returns

The Q2 waste returns were received on time. All accepted EWC codes are compliant with the permit. The site accepted a total of 524.4 tonnes and removed a total of 703.4 tonnes. The returns are accepted.

END.

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

1. Management

- IR1A – General management
- IR1B – Finance (only applicable to Landfill)
- IR1C – Energy efficiency
- IR1D - Efficient use of raw materials
- IR1E - Avoidance, recovery and disposal of wastes produced by the activities
- IR1F - Multiple operator installations

2. Operations

- IR2A – Permitted activities
- IR2B – The site
- IR2C – Operating techniques
- IR2D – Technical requirements
- IR2E – Improvement programme
- IR2F – Pre-operational conditions
- IR2G – Landfill engineering (only applicable to Landfill)
- IR2H – Waste acceptance (only applicable to Landfill)
- IR2I – Leachate levels (only applicable to Landfill)
- IR2J – Closure and aftercare (only applicable to Landfill)
- IR2K – Landfill gas management (only applicable to Landfill)

3. Emission and Monitoring

- IR3A – Emissions to water, air or land
- IR3B – Emissions of substances not controlled by emission limits
- IR3C – Odour
- IR3D – Noise and vibration
- IR3E – Monitoring
- IR3F – Pests
- IR3G – Air quality management plans
- IR3H – Monitoring for the purposes of the Industrial Emissions Directive (this heading includes Large Combustion Plants)
- IR3I – Fire

4. Information

- IR4A – Records
- IR4B – Reporting
- IR4C – 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.