

Compliance Assessment Report CAR_NRW0045347

Permit being assessed: CP3198FE.

For: A C D Skips Ltd, **held by:** A C D Skips Ltd

At: Brynmenen Industrial Estate, Brynmenen, Bridgend, Glamorgan, CF32 9SQ.

Type of assessment: Site Inspection,

Reason: Routine.

On: 08/08/2024 between 10:50 and 11:20.

Parts of permit assessed: management systems.

NRW Lead Officer: Magda Leonowicz.

Report sent to: Phillip Edwards, Site Manager and TCM, on 04/10/2024.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W2A - Waste - Operations - Permitted activities	Assessed (A)	
W2F - Waste - Operations - Technical requirements	Assessed (A)	
W1A - Waste - Management - General management	C3 Minor	Permit condition 1.1.1 (a) specifies that the operator shall manage and operate the activities 'in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
		complaints'

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
W1A	Your EMS is not up to date. Provide an up to date EMS	04/11/2024

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.

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

On the 8th of August 2024 a Waste Regulation Officer Magda Leonowicz and a Tackling Waste Crime Dewi Williams conducted an unannounced compliance visit to ACD Skips Ltd., Plot 42B, Brynmenyn Industrial Estate, Bridgend. The weather was warm and rainy. The site was due an inspection as part of normal regulation activities and the purpose of the visit was to assess general management on the site. We met with the site's TCM Phillip Edwards and Director Viv Hughes, who showed us around the site.

Operations at the site

During the visit, the site was busy and waste operations were taking place inside the building. Mixed waste that was brought in skips, was unloaded in the middle of the building. Then it was inspected and sorted into piles. Individual waste streams are being removed from the site by company's lorries and sent off for recovery or disposal to various waste authorised facilities on daily basis. The company owns 12 lorries, which are available and operating as required. Any unpermitted waste is not stored at the site, and it is immediately returned to the provider.

The drainage system and discharge

The site benefits from the concrete impermeable surface with a sealed drainage. During the visit, I inspected the concrete surface inside and outside the building. It appeared intact with no visible damage. The drainage inlet located across the building entrance was working, but there was a small amount of debris inside it.

The permit holder has a consent from DCWW to discharge into the foul sewer.

Technically Competent Manager (TCM)

The Technically Competent Manager (TCM) certificate is up to date.

Waste transfer notes

I reviewed waste transfer notes, which I photographed and uploaded to NRW's database.

Breaches:

C2 Management System. Category 3 breach

Permit condition 1.1.1 (a) specifies that the operator shall manage and operate the activities '*in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints*'

A **Category 3 breach** has been scored because the working plan is not up to date. The working plan states that the site benefits from an interceptor and a sump, while the discharge is into the foul sewer.

Action:

Please review and update your Working Plan/Environment Management System(EMS) in line with the guidance. For more information follow the link [Natural Resources Wales / How to develop an environment management system for your environmental permit](#) .

[Develop a management system: environmental permits - GOV.UK \(www.gov.uk\)](#)

Please provide the above information to me by **01/11/2024**

If you have any queries please contact me on
Magda.Leonowicz@cyfoethnaturiolcymru.gov.uk





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.