

Compliance Assessment Report

Report ID:
CAR_NRW0034355

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

Site	The Waste Transfer Station	Permit Ref	BP3599SZ			
Operator/Permit holder	Nolan Recycling Ltd					
Regime	Waste Operations					
Date of assessment	12/12/2018	Time in	11:30	Out	12:30	
Assessment type	Audit					
Parts of the permit assessed	Incident Management					
Lead officer's name	Davies, Gareth					
Accompanied by	Willington, Jonathan					
Recipient's name/position	Emma Cull/ Director	Date issued	17/12/2018			

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
A1 - Specified by permit	A	
B3 - Infrastructure - Site drainage engineering (clean and foul)	A	
D2 - Incident Management - Accidents, emergency and incident planning	A	
F4 - Amenity - Pests/birds and scavengers	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	0	Total compliance score (see section 5 for scoring scheme)	0
------------------------------------	----------	---	----------

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

Present

Emma Cull (EC) – Nolan Recycling Limited (NRL)
James Nolan (JN) – Nolan Recycling Limited (NRL)
Gareth Davies (GD) – Natural Resources Wales (NRW)
Jon Willington (JW) – Natural Resources Wales (NRW)

The visit was undertaken following two incidents that had been reported to NRW.

On 23 November 2018, Natural Resources Wales were notified of a small fire that had occurred on site. Initial notification was received by South Wales Fire and Rescue Service (FRS) and subsequently by EC of NRL once the incident had been dealt with. EC and JN confirmed that the a load of waste had been accepted on site. Upon accepting the waste the banksman thought that they could smell smoke / burning. The decision was taken not to tip the waste on site. The skip was left within the middle of the concreted yard area over night. The night supervisor noticed that the waste bin had begun to smoulder and subsequently rang the FRS. The incident was attended and a spray used to dampen down the waste after it had been tipped on the impermeable surface. The incident was over within an hour. All water was contained within the sealed drainage system and is awaiting collection by a contractor.

It is noted that the actions of checking and not depositing the skip likely prevented a larger incident from occurring on site given the time of day that the waste was accepted.

Action: If not already included, it is recommended that these steps are included in the written management system along with any other learning points.

On 26 November 2018, NRW were notified by a report to the incident hotline that NRL had a "rat infestation". NRL were originally notified of this by GD via e-mail and phone on 27 November 2018.

During the meeting EC and JN confirmed a number of steps that NRL take to minimise pests, namely rats from occurring on site. Bait boxes are used and checked on site. Certain waste types from certain sources are kept on site for a minimal amount of time due to odour and subsequent potential for rats to come on to site. NRL were able to name certain sources that they do not keep on site for long. It was also highlighted that rats can sometimes come on to site within skips that have been deposited. it is recommended that when this does occur that it is logged within the site diary.

GD requested that NRL produce a Pest Management Plan to document the steps that NRL take to minimise the likelihood of rats being attracted to site and managing rats in the event that they are present on site.

Action: A Pest Management Plan shall be produced and submitted to NRW. Guidance document 'How to Comply with your environmental permit', in particular the Pests Section on p48 shall be used to produce the Pest Management Plan.

Site Tour

A short site walk around was undertaken.

During the site walk there was no evidence of rats on site. Bait boxes were witnessed on site.

JN confirmed that infrastructure improvements had taken place on site. The final area of concrete adjacent to the fuel storage area had been completed. This whole area was now concreted and the risk to the groundwater significantly reduced.

Interceptors and drainage had now been installed to capture any surface water run-off leaving the site towards the entrance as specified in the permit. Some additional small areas of concreting need to be undertaken to complete these works. JN confirmed that in time they will look to complete further concreting round towards the fines storage area.

END

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0034355**

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

Site	The Waste Transfer Station	Permit Ref	BP3599SZ
Operator/Permit holder	Nolan Recycling Ltd	Date	12/12/2018

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			

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.