

## Compliance Assessment Report CAR\_NRW0045359

**Permit being assessed:** AB3092FR.

For: Llantrisant Recycling, held by Llantrisant Recycling Centre Limited

At: Llantrisant Recycling, Pantybrad Lane, Llantrisant, Pontyclun, CF72 8YY.

**Type of assessment carried out:** Site Inspection, Reason: Routine.

On 11/07/2024 between 11:35 and 13:10.

Parts of permit assessed: All

**NRW Lead Officer:** Amy Bailey, accompanied by Laoni Tye.

**Report sent to:** Tom Prichard and George Harvey , Director and Technically Competent Manager on 05/12/2024.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
W2E - Waste - Operations - Waste acceptance	C3 Minor	1.1.1
W3G - Waste - Emissions and monitoring - Fire	C3 Minor	3.6.1
W2C - Waste - Operations - Operating techniques	C3 Minor	S1.1 A2

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
3	12

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
W2E	Please update the EMS and specify procedures for waste acceptance and management.  Please provide waste transfer notes and the analytical testing report results for the fines that were present on the day of the inspection	02/02/2025
W3G	All waste needs to be managed fully in line with FPMP guidance which includes stack sizes and separation distances.	05/12/2024
W2C	Please send the sampling data for the latest batch of material going through the composting process.	16/01/2025

Criteria	Action needed	Complete by
	Provide the supply documentation for the latest batch that left site. Including Date of supply, customer name and contact details, delivery address and quantity supplied. Comply with the conditions specified	

Action 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

#### **Introduction**

Industry and Waste Regulation Officer Amy Bailey, and Senior Waste Regulation Officer Laoni Tye attended the permitted facility of, Llantrisant Recycling, Pantbrad Lane, Llantrisant, Pontyclun, CF72 8YY on the 11<sup>th</sup> July 2024 to undertake an unannounced inspection, arriving at approximately 11:35 AM. The weather was overcast but remained dry.

Llantrisant Recycling hold a Bespoke permit, Environmental permit reference EPR/AB3092FR. This allows the operator to operate an Inert and non-hazardous household, commercial and industrial waste transfer station with treatment. The permit also includes open windrow composting, treatment of street sweepings and a heat treatment facility.

We were met by the sites Technically Competent Manager (TCM) and the site manager.

#### **W3G Category 3 breach. Permit condition 3.6.1**

***Permit condition 3.6.1 states, the operator shall manage and operate the activities in accordance with a written fire prevention plan using the current, relevant fire prevention and mitigation plan guidance.***

You have been given this breach because during the visit we observed waste being stored higher than the concrete storage blocks.

The guidance and the FPMP stipulates that a 1 metre free board be left between the top of stockpiles and the top of bay walls. This ensures any walls used for separation distances are effective and reduces the chance of spread of fire between piles. This was not being complied with at the time of the visit.

Officers were advised that the volume of waste on site was due to the picking line breaking down and was due to be remedied promptly.



**Action - All waste needs to be managed in line with the sites Fire Prevention and Mitigation Plan, in accordance with the Fire Prevention and Mitigation Plan guidance, which includes stack sizes and separation distances.**

### **Composting**

**W2C Category 3 breach. Permit condition S1.1 A2**

Permit condition table S1.1 A2 states:

**Table S1.1 activities**

<p>A2 – Open windrow composting</p>	<p>R13: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)</p> <p>R3: Recycling/reclamation of organic substances which are not used as solvents</p>	<p>All waste must be stored and treated on an impermeable surface with sealed drainage.</p> <p>Physical treatment, composting and maturation of the types of waste listed in table S2.2.</p> <p>Physical treatment consisting only of:</p> <ul style="list-style-type: none"> <li>- composting</li> <li>- maturation</li> <li>- manual separation</li> <li>- sorting</li> <li>- shredding</li> <li>- screening</li> <li>- bagging</li> </ul> <p>of the types of waste for the purpose of recovery.</p> <p>The storage, physical treatment and composting of wastes under anaerobic conditions shall be prevented.</p> <p>Each composting batch shall undergo an identifiable sanitisation and stabilisation stage.</p> <p>The total quantities of wastes undergoing biological treatment at the whole site shall not exceed 75 tonnes per day.</p>
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***You have been given this breach because the composting activities on site are not in accordance with the permit, Compost Quality Protocol or Site Specific Bioaerosol Risk Assessment (SSBRA September 2020)***

There were no active windrows or any finished product on site during our visit. There was a large stockpile of green waste, and we were advised by the TCM that all windrows are produced at the same time once there is enough product on site. This is a breach of your EMS that states that ‘shredding green waste material and placing it in windrows will be carried out within as short as operationally feasible time frame from receipt’.

Your SSBRA dated September 2020 states that ‘the composting area houses up to four windrows measuring 60m x 6m x 3m (L x W x H). All shredding, turning and screening work takes place within the designated composting area of the concrete yard. ‘Windrows of material in the stabilisation/maturation phase will be left for 10 to 14 weeks, dependent upon temperature readings, etc. and turned every week, during this time’.

Properly constructed and managed windrows are critical to ensure that you can demonstrate you are undertaking the permitted activity “aerobic composting”. The layout and direction of windrows also ensures there is no cross contamination and aligns with measures required to minimise bioaerosol release.

Your permit also states that “each composting batch shall undergo an identifiable sanitisation and stabilisation phase”. Without active and identifiable windrows in situ, this process is not possible.

We would expect to see clearly defined phases of the composting process. All batches must be clearly identifiable as feedstock, sanitisation phase, stabilisation, and maturation. All batches within these phases should be clearly labelled and traceable from receipt of waste into this area to dispatch.

The controls that we would expect, as a minimum, would include a clear moisture and temperature monitoring strategy for all the windrows. That the monitoring locations are identifiable to allow representative data analysis. This helps inform the health of the process and points at which the windrows can be turned, and materials enter the next phase of the process. Probes used for temperature must be able to reach the core of a windrow.

The composting process needs to be discussed in further detail as to how this procedure is working.

#### **Actions-**

- **Please send the sampling data for the latest batch of material going through the composting process.**
- **Provide the supply documentation for the latest batch that left site. Including Date of supply, customer name and contact details, delivery address and quantity supplied.**
- **Comply with the conditions specified.**

#### **W2E Category 3 breach of permit condition 1.1.1**

***You have been given this breach because waste acceptance procedures are not being followed.***

Whilst we were on the weighbridge, we noted that visual checks of incoming and outgoing loads were not being undertaken. In addition, there are no camera's operating from the office that can see into the lorries that are on the weighbridge. Waste acceptance procedures are therefore not being properly carried out.

The EMS states 'All wastes that are received at Llantrisant Recycling are visually checked when tipped off and whenever practical, when weighed in at the weighbridge'.

All wastes entering the site should be being checked to ensure that the waste is as described on the waste transfer note and is an accepted waste code specified in your permit.

If waste is not being checked as it is received, you are unable to manage unpermitted waste streams. This could also lead to contaminated stockpiles.

**Action- Please update the wording in your EMS to reflect the need for visual checks to be mandatory. Please send the amended copy to NRW by 2nd February 2025.**

Whilst on the weighbridge we spoke to a driver who was leaving site with a full load. The load looked to be mixed construction and demolition waste. The material wasn't checked by the weighbridge operator and staff weren't able to demonstrate how they ensure that the waste leaving the site matches the waste transfer note without visual checks or CCTV and also provide a sufficient explanation of where on the site material had come from.

When we asked to be shown where the material in question had come from, we were taken to the mixed civic amenity waste area. This confirms that mismanagement will occur without a robust and outlined process for waste acceptance.

**Action- Please update the EMS be updated and specify procedures for waste acceptance and management.**

**Fines**

Officers inspected the fines on site and observed what appeared to be contamination of organic waste.



**Action- Please provide waste transfer notes and the analytical testing report results for the fines that were present on the day of the inspection.**

**General**

The odour from site was perceived by officer's present to be minimal and was not identified outside of the permit boundary.

The storage lagoon was inspected and deemed to be in compliance with the Environmental Management System.

Many thanks for your time during the inspection.

If you have any queries regarding this Compliance Assessment Report please contact regulatory officer Amy Bailey on 0300 065 3000, or via email at

[Amy.bailey@naturalresourceswales.gov.uk](mailto:Amy.bailey@naturalresourceswales.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.

### **What are suspended scores?**

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 and Waste action criteria (used in section 1 and 2):**

#### **A: Permitted activities**

- A1 Specified by permit

#### **B: Infrastructure**

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

#### **C: General management**

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

#### **D: Incident management**

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

#### **E: Emissions**

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

#### **F: Amenity**

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

#### **G: Monitoring and records, maintenance and reporting**

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

#### **H: Resources efficiency**

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

### **Enforcement response**

Any permit condition non-compliance 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 20 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 – 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.