

Compliance Assessment Report CAR_NRW0045792

Permit being assessed: DB3299FV.

For: Pembrokeshire Eco Park, held by Pembrokeshire County Council

At: Amoco Road, Milford Haven, Pembrokeshire, SA73 3FB.

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

On 03/12/2024 between 12:00 and 13:30.

Parts of permit assessed: See Below

NRW Lead Officer: Michael Edwards, accompanied by Sally Wakeford.

Report sent to: Nigel Cole, Site Manager on 09/12/2024.

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

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
W1A - Waste - Management - General management	Assessed (A)	
W2A - Waste - Operations - Permitted activities	Assessed (A)	
W2C - Waste - Operations - Operating techniques	Assessed (A)	
W2D - Waste - Operations - The site	Assessed (A)	
W2E - Waste - Operations - Waste acceptance	Assessed (A)	
W3A - Waste - Emissions and monitoring - Emissions to water, air or land	Assessed (A)	
W3C - Waste - Emissions and monitoring - Odour	Assessed (A)	
W3D - Waste - Emissions and monitoring - Noise and vibration	Assessed (A)	

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

Total number of 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

Arranged first site inspection undertaken by Michael Edwards and Sally Wakeford of Natural Resources Wales following permit issue (29/10/2024), accompanied on site by permit operator and WRAP consultants

At the time of the inspection the (Household Waste Recycling Centre) HWRC was not in operation and did not contain any wastes nor were waste activities being undertaken.

General Management - W1A

Under condition 1.1.1 (a) of the permit, the site is required to be operated in accordance with a written management system (EMS) which identifies and minimises the risks of pollution arising from operations.

During the inspection it was noted that the site is well run, with activities taking place as described in the EMS provided to Natural Resources Wales (*PCC_EMS.S4.01._v4*) with storage bays used within the main building to bulk waste prior to treatment activity and further temporary storage on site.

Condition 1.1.3 requires any persons having duties affected by the matters set out in the permit shall have convenient access to a copy of the permit kept at or near the place those duties are carried out. As discussed on site, electronic copies are kept on site for access in the office and hard copies are stored within the filing system in the weighbridge office which was confirmed by officers during the inspection.

Under **condition 1.1.4** the operator shall comply with the requirements of an approved competency scheme. In the EMS provided to NRW the Technical Competent managers are listed. The certification for the site manager N.C is up to date, being completed 15/11/2023. Secondary competence cover, is upheld by P.H who is required to complete his continuing competency which expired 30/11/2024 and A.W having completed certification 3/12/2024.

Waste Operations

Permitted Activities - W2A

Permitted activities on site are limited to the activities listed in **Schedule 1 table S1.1** of the permit. During the inspection the site was compliant with the limits of **table S1.1**, with activities on site limited to storage and treatment of wastes within buildings.

Operating Techniques - W2C

Operations identified at the time of the inspection were in accordance with the documents submitted and referenced in **Schedule 1, table S1.2** as required under **condition 2.3.1 (a)**. With all wastes stored on impermeable surfaces with sealed drainage systems.

The Site - W2D

All waste activities were within the permitted boundary of the site, highlighted in **Schedule 7** as required under **condition 2.2.1**.

Waste Acceptance - W2E

Wastes identified during the inspection were compliant with those listed in **Schedule 2** of the permit in line with **condition 2.3.2**.

Emissions and Monitoring

Emissions to water, air or land - W3A

Under **condition 3.1.1** the site is required to operate in a manner that shall not cause pollution of emissions of substances not controlled by emissions limits.

Condition 3.1.2 requires that all liquids whose emissions to water or land cause a pollution are provided with secondary containment or other appropriate measures.

No issues with the above conditions were identified during the inspection no emissions were noted leaving the site, and drainage systems were well maintained with the entire site benefitting from a raised kerb around the permitter.

Odour, Noise and Vibration - W3C & W3D

Emissions from the activities on site must be free from odours likely to cause a pollution outside as perceived by an officer of NRW under **condition 3.2.1**. At the time of the inspection all wastes storage and activities were undertaken within buildings and no odours were detected outside of the site as required.

The level of noise and vibrations on site at the time of the inspections were not at a level likely to cause pollution, hazard or annoyance outside the boundary of the site at the time of the inspection as required under **condition 3.3.1**.

Many thanks for your time during the inspection.

END.

Any compliance criteria not highlighted in the above summary should be considered as not assessed. In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resource Body for Wales (Establishment) Order 2012. You should note that the Natural Resources Body for Wales has been

formed by bringing together the Countryside Council for Wales, Forestry Commission Wales and Environment Agency Wales. The Natural Resources Body for Wales has been empowered to exercise Welsh devolved functions since 1 st April 2013 and has, generally, taken over the responsibilities of the Countryside Council for Wales, the Forestry Commissioners and the Environment Agency for Wales.

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 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.