

Compliance Assessment Report CAR_NRW0045829

Permit being assessed: YP3794EV.

For: Gwynedd Council, held by Gwynedd Council

At: Dolgellau, Gwynedd, LL40 2YF.

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

On 28/11/2024 between 10:35 and 11:30.

Parts of permit assessed: See below

NRW Lead Officer: Dafydd Williams, accompanied by Daniel Grant.

Report sent to: Endaf Williams, TCM on 16/01/2025.

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

| Part of permitted activity assessed (criteria) | Assessment result | Permit condition |
|---|-------------------|------------------|
| W4B - Waste - Information - Reporting | C4 No impact | 4.2.2 |
| W2A - Waste - Operations - Permitted activities | C3 Minor | 2.1 |
| W1A - Waste - Management - General management | C3 Minor | 1.1.1 |

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

| Total number of non-compliances recorded | Total non-compliance score |
|--|----------------------------|
| 3 | 8.1 |

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 |
|----------|---|-------------|
| W4B | Please submit missing waste returns. | 31/01/2025 |
| W2A | All asbestos waste must be double bagged securely. | 16/01/2025 |
| W1A | Ensure waste activities on site are written in accordance with EMS. Update EMS as detailed below. | 16/01/2025 |

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.

You are non-compliant with your permit.

At this time, we are issuing you with a warning for the non-compliance recorded above. Warnings may influence future enforcement response for continued or further non-compliance.

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

Dolgellau Civic Amenity Site

CARS Report

Introduction

This was an unannounced visit carried out on the 28th of November 2024 by Natural Resources Wales (NRW) officers Dafydd Wiliams (Higher Education Placement Officer) and Daniel Grant (Hazardous Waste Regulation Officer).

Officers met with a site operative at 10:35am and were asked to sign in to the site. No site supervisor was present.

Weather during the inspection was dry and cloudy.

The civic amenity site was operational during our visit, with members of the public disposing of waste throughout the inspection. The site was tidy with minimal litter to be seen.

Officers inspected various waste skips. Labelling of the skips were to a very high standard, waste was segregated appropriately, and no mixing of waste was identified.

The following non-compliances were identified:

2.1 – Permitted Activities

During our inspection, officers examined the container for storing asbestos. Inside the container asbestos was not stored appropriately. As seen in Image 1 the double bag was not sealed appropriately, and the asbestos had fallen out across the floor of the skip. Under condition 2.1, Table S1.1 in Schedule 1 of your permitted activities states that; '*All asbestos waste must be double bagged and kept within secure lockable containers*'.



Image 1 – Open bag of asbestos in container

As a result, this is non-compliant with permit condition 2.1.1 and a CCS breach of 3 has been assigned.

ACTION – Ensure all asbestos accepted at the site is double bagged securely.

Deadline - Upon receipt of this report

4.2.2 - Summary Record of Waste Acceptance

Waste returns record all waste that is accepted and removed from your site. Condition 4.2.2 of your permit states that you must submit your waste returns within one month of the end of each quarter, detailing all waste that you have accepted and removed during this period. NRW has not received any waste returns from Dolgellau Civic Amenity site for Q2 and Q3 of 2024.

As a result, this is non-compliant with Condition 4.2.2 and a CCS breach 4 has been assigned.

ACTION – Submit waste returns for Q2 and Q3 to NRW.

Deadline- 31/01/2025

1. Management and Operation of Activities

2.

This condition makes it a requirement to hold a written Environmental management system (EMS) that identifies and minimises risk of pollution.

During the site inspection, officers identified 2 non-compliances in accordance with your EMS.

1.1. Waste Transfer Notes

Officers inspected Waste Transfer Notes (WTN) at the site, and identified that some were missing the following:

- EWC code
- Full address for where the waste was being taken to

Examples of these non-compliances can be seen in Image 2.

This information is required as per your Waste Duty of Care requirements. Further information about this can be found on the following guidance, which specifies what information is required in a waste transfer note:

https://assets.publishing.service.gov.uk/media/6274d74bd3bf7f5e3ade6090/Waste_duty_of_care_code_of_practice.pdf

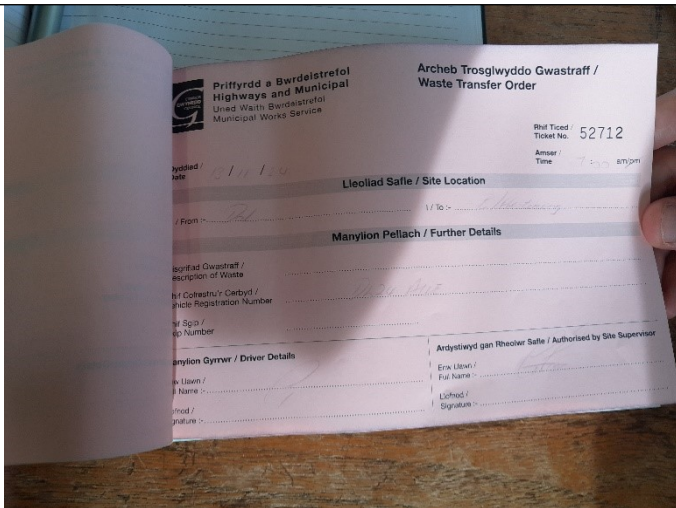


Image 2 – Example of Waste Transfer Notes

ACTION- Review EMS and implement procedure to ensure Waste Transfer Notes are completed in accordance with the Waste Duty Care. Please send an updated version to NRW upon completion.

Deadline 31/01/2025

2.2. Storing of Household Chemicals

Section 29 of your EMS states that all substances must ‘be stored within the Civic Amenity chemstore’, and that the ‘chemstore must be locked at all times’. During the inspection, NRW officers identified chemicals being stored outside of the designated chemstore, on a wooden pallet. Please see Image 3 for reference. These chemicals stored were not stored in accordance with the site EMS.



Image 3 – Household chemicals stored on wooden pallet.

ACTION - Ensure chemical waste is stored in accordance with the site EMS.

Deadline – Upon receipt of this report

As a result of both the above non-compliance with the EMS a combined CCS breach of 3 has been assigned.

An overall score of 8.01 has been assigned for the CAR.

Thank you for your time during the visit.

Dafydd Williams

Lleoliad Addysg Uwch Rheoleiddio Gwastraff / Waste Regulation Higher Education Placement

Tîm Lleoliadau Rheoleiddio Gwastraff / Waste Regulation Placements Team

Fe/Fo / He/Him

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi. Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.

In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) order 2012.

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.