

Compliance Assessment Report CAR_NRW0046185

Permit being assessed: JB3531AB.

For: Enviroventure Waste Solutions Recycling Facility, **held by:** Enviroventure Waste Solutions Limited

At: Waterston Ind Est, Waterston, Milford Haven, Pembrokeshire, SA73 1DP.

Type of assessment: Site Inspection,

Reason: Routine.

On: 04/02/2025 between 10:30 and 11:15.

Parts of permit assessed: See Below.

NRW Lead Officer: Michael Edwards, accompanied by Edward Davies.

Report sent to: Diana Jones, Director, on 18/02/2025.

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

Part of permitted activity assessed (compliance criteria)	Assessment result	Permit condition
W1A - Waste - Management - General management	C2 Significant	1.1.1 a
W2A - Waste - Operations - Permitted activities	Assessed (A)	
W2C - Waste - Operations - Operating techniques	C3 Minor	2.3.1 (a)
W2D - Waste - Operations - The site	Assessed (A)	
W2E - Waste - Operations - Waste acceptance	Assessed (A)	
W3A(3) - Waste - Emissions and monitoring - Emissions to land	Action only (X)	

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

Total non-compliances recorded	Total non-compliance score
2	35

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	Ensure that wastes are stored appropriately as described within the submitted EMS.	04/03/2025
W2C	Ensure that wates are stored on an impermeable surface as required under the permit.	04/03/2025
W3A(3)	Ensure that litter does not escape from the site, and provisions listed in the EMS are followed.	04/03/2025

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.

You are non-compliant with your permit.

We are currently considering taking enforcement action against you for the non-compliance recorded above. We will contact you in due course.

4. Details of our assessment

Unannounced site inspection undertaken by Michael Edwards and Edward Davies of Natural Resources Wales accompanied on site by permit operator.

General Management – W1A – Category 2 Breach

Previous inspections at the site have noted significant fire risk and issues with the method of waste storage on site.

During the inspection it was noted that wastes were stored along the outer border of the site, in an 'L' like shape mostly on an impermeable surface. However, as discussed on site, the waste is required to be stored in a manner described in the submitted Environmental Management Systems (EMS) as per **condition 1.1.1 a** of the permit.



The current EMS (Version 1, dated January 2023) states; *Separation distances will be maintained to be as large as possible for the short term with the site developing an improvement programme covering the next 8-12 months. Within this timeframe A rated fire blocks are to be installed progressively across the site and between the 3 stockpiles on site.*

During the inspection, no fire breaks or fire blocks were installed resulting in the waste being stored as a large single stockpile which will pose a significant fire risk.

This has been scored as a **category 2 breach** of permit **condition 1.1.1 a**.

Action – You must ensure that wastes are stored in line with the conditions of the permit and as described within the sites written management systems.

The permit was made available on request within the site office and the operator confirmed the TCM

requirements as required under **conditions 1.1.3 and 1.1.4.**

Waste Operations – W2A, W2C, W2D & W2E - Category 3 Breach

Wastes were stored within the permitted boundary highlighted in **schedule 7** of the permit as per **condition 2.2.1.**

Under **condition 2.3.1 (a)** the sites is required to manage the operations in line with **schedule 1;**

Schedule 1 - Operations

Table S1.1 activities	
Description of activities for waste operations	Limits of activities
D9: Physico-chemical treatment not specified elsewhere in Annex IIA which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D8 and D10 to D12	Treatment consisting only of manual sorting or manual separation of waste into different components for disposal, (no more than 50 tonnes per day) or recovery.
D14: Repackaging prior to submission to any of the operations numbered D1 to 13	All waste shall be stored and treated on an impermeable surface with a sealed drainage system.
D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)	No more than a total of 50 tonnes of intact and shredded waste vehicle tyres (waste codes 16 01 03 and 19 12 04) shall be stored at the site.
R3: Recycling/reclamation of organic substances which are not used as solvents	Only waste types as specified in Table 2.1 shall be accepted.
R4: Recycling/reclamation of metals and metal compounds	
R5: Recycling/reclamation of other inorganic materials	
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)	

During the inspection a small amount of waste was stored on an area of hardstanding, which had

significant pooling of water on site during the inspection.



As above in **schedule 1**, the site is required to store and treat waste on an impermeable surface with sealed drainage system.

This has been scored as a **category 3 breach** of permit **condition 2.3.1 (a)**.

Action – Ensure that wastes are stored appropriately as required under the conditions of the permit, ensure that regular maintenance is undertaken on the drainage system of the yard to ensure it functions as required.

Wastes identified during the site inspection were compliant with **condition 2.3.2 (a)** and **schedule 2** of the permit, a large fraction of which was shredded waste materials, however no evidence of the shredding activity being undertaken on site was noted during the inspection.

Emissions – W3A

Following the inspection on site, officers accessed the fields to the rear of the permitted area and found a significant amount of waste and litter that had escaped site.



Under the condition 1.1.1 (a) and the EMS, to prevent wind blown litter from escaping site; *Litter will be managed on site daily via visual checks. Due to the waste types being tipped and sorted within the site and the netting installed around the storage area, wind-blown wastes are not thought to be an issue*

Action – ensure that provision are installed to ensure that waste and litter does not escape from site and collect wind blown litter as detailed within the EMS.

Given the severity of the permit breaches and the breaches that have been identified previously, Natural Resources Wales must consider its enforcement action, however, you will be written to separately regarding this matter.

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.

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.