

## Compliance Assessment Report CAR\_NRW0046399

**Permit being assessed:** DP3095FK.

**For:** Coed Top Hill, **held by:** Caerphilly County Borough Council

**At:** B4254, Gelligaer Road, Nelson, Treharris, CF46 6ER.

**Type of assessment:** Site Inspection,

**Reason:** Routine.

**On:** 19/02/2025 between 10:45 and 11:15.

**Parts of permit assessed:** Various.

**NRW Lead Officer:** Carla Curtis, accompanied by Greg Gardner.

**Report sent to:** Glynn Gibbs, Assistant Engineer , on 05/03/2025.

### 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	Assessed (A)	
W2A - Waste - Operations - Permitted activities	Assessed (A)	
W2C - Waste - Operations - Operating techniques	Assessed (A)	
W2F - Waste - Operations - Technical requirements	Action only (X)	
W3C - Waste - Emissions and monitoring - Odour	Assessed (A)	
W3F - Waste - Emissions and monitoring - Pests	Assessed (A)	
W4B - Waste - Information - Reporting	Assessed (A)	

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

Total 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?

Criteria	Action needed	Complete by
W2F	Please forward a copy of the Continuing competence certificate.	12/03/2025

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.

**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

*This report details the site visit made on the 19 February 2025 to Caerphilly County Borough Council, Coed Top Hill - permit reference number EPR-DP3095FK.*

Natural Resources Wales (NRW) Officers Carla CURTIS and Greg GARDNER attended site at 10:45 to conduct an unannounced routine inspection. They were met by the site supervisor who accompanied officers around the site. Weather conditions were cold and overcast at the time of inspection.

Site operations consist of a municipal street cleaning and gully waste dewatering facility with biological treatment via reed beds. Since last site visit in March 2023, a variation application was made to remove the condition requiring sampling of a permitted discharge (formally condition 4.6) and waste coded as 19 05 01 (non-composted fraction of municipal and similar wastes), also to add wording to clarify that all liquid waste from the site is disposed of via sewer to DCWW. (See below)

Description	Date	Comments
Waste Management Licence determined EAWML 30392	05/12/06	Permit for biological treatment facility issued to Caerphilly County Borough Council.
Application EPR/DP3095FK/V002 (variation and consolidation) (formerly EAWML 30392)	Duly made 20/05/24	Variation application made by the operator to remove condition requiring sampling of a permitted discharge (formerly condition 4.6) and waste coded as 19 05 01 (non-composted fraction of municipal and similar wastes), and to add wording to clarify that all liquid waste from the site is disposed of via a sewer to DCWW.  The permit was also updated to modern conditions via a NRW initiated variation.
Variation determined EPR/DP3095FK	18/09/24	Varied and consolidated permit issued in modern condition format.

### Staff competency/training

The TCM certificate we have on file has expired, I understand this has been renewed please forward the latest copy.

**ACTION REQUIRED:** Provide evidence for the Technically Competent Manager for the site.

**DUE DATE:** 12th March 2025

### Site Observations

NRW Officers did not witness any offensive odours or excessive noise emanating from the permitted area during the inspection.

The yard area nearest to the site office appeared to be in good order.

The storage bays appeared to be in good condition with the drainage channels free of obstructions. The current stockpile was within permitted limits and of no concern. The integrity of the drying bays appeared to be free of cracks and show no signs of degradation.



**Photo 1 – dewatering bay containing waste residues**



**Photo 2 – showing reed beds flowing from right to left**

### **Waste Returns**

The quantity of wastes accepted at the site shall not exceed 4,999 tonnes a year. The total amount of waste(s) received at site for 2024 was 4165.5 tonnes. This is within the sites environmental permit allowance.

If you have any queries regarding this Compliance Assessment Report please contact regulatory officer Carla CURTIS via email at [Carla.curtis@naturalresourceswales.gov.uk](mailto:Carla.curtis@naturalresourceswales.gov.uk)

***In this document 'Natural Resources Wales' means the Natural Resource 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.

**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](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.