

Compliance Assessment Report

Report ID:
CAR_NRW0035242

This form will report compliance with your permit as determined by an NRW officer

Site	Tegfan Recycling		Permit Ref	AB3697FW		
Operator/Permit holder	Huw Jones					
Regime	Waste Operations					
Date of assessment	18/04/2019	Time in	09:45	Out	10:10	
Assessment type	Site Inspection					
Parts of the permit assessed	A, B, C, F					
Lead officer's name	Davies, Eleanor					
Accompanied by						
Recipient's name/position	Huw Davies/ TCM		Date issued	14/06/2019		

Section 1 – Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations or the licence under the Water Resources Act 1991 as amended by the Water Act 2003. A detailed explanation is captured in "Compliance Assessment Report Detail" (Section 2) and any actions you may need to take are given in the "Action(s)" (section 4). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS Scores can be consolidated or suspended where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit conditions and compliance summary	CCS Category	Condition(s) breached
A1 - Specified by permit	A	
B1 - Infrastructure - Engineering for prevention and control of emissions	C3	2.1.2 table 2.1(d)
C2 - General Management - Management system and operating procedures	A	
C3 - General Management - Materials acceptance	A	
C4 - General Management - Storage, handling labelling and Segregation	A	
F3 - Amenity - Dust/fibres/particulates and litter	A	
F5 - Amenity - Deposits on road	A	

KEY: See Section 5 for breach categories, suspended scores will be indicated as such.
A = Assessed or assessed in part (no evidence of non-compliance), **X** = Action only,
O = Ongoing non-compliance, not scored.

Number of breaches recorded	1	Total compliance score (see section 5 for scoring scheme)	4
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If the Number of breaches recorded is greater than zero, please see Section 3 for our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- The part(s) of the permit that were assessed (eg. Maintenance, training, combustion plant, etc)
- Where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- Any non-compliances identified
- Any non-compliances with directly applicable legislation
- Details of any multiple non-compliances
- Information on the compliance score accrued inc.
- Details of advice given
- Any other areas of concern
- Any actions requested
- Any examples of good practice
- A reference to photos taken

Environment Officer Eleanor Davies attended site to carry out an unannounced site inspection. I was met on site by Huw Davies and Laura (apologies I didn't catch the surname). Huw Davies accompanied me around site for the site inspection. followed by a meeting in the site office to look over paperwork with Laura and Huw.

There were several large piles of soil and rubble being stored in the external yard area awaiting processing.



A large pile of soil and stone was being stored on a concrete pad, however there did not appear to be a drainage system in place for this area. Condition 2.3.1, table 2.3(2) states "specified waste shall be stored and treated on hard standing or on an impermeable surface with sealed drainage system." This condition is in place to prevent point source discharges from this type of waste by either collecting it in a sealed drainage system if stored on an impermeable pad, or allowing any liquids to percolate through the hardstanding over a larger area. Please ensure the soil is removed from the concrete pad onto hardstanding or ensure that the impermeable pad is serviced by a sealed drainage system. **Compliance Criteria B1 CCS Score C3.**

The management plan for site refers to a Site Drainage plan however we do not have a copy of this on file. Please send though a



copy for our records.

The area at the back of the external yard is untidy with general waste being stored such as old tyres / caterpillar tracks, tarpaulin etc. While some of this waste has been generated on site C&D waste from the main storage area is beginning to encroach on this area as there are no barriers to prevent this happening. Please improve housekeeping on site and ensure that all wastes stored on site are contained and segregated appropriately.



The building on site is in good condition and is serviced by an impermeable pad. Within the building there was a large pile of soil awaiting screening. It was explained that the screen is currently broken and awaiting a part but once that has been fixed the pile will be processed. There was also a large pile of mixed waste stored within the building which is manually sorted. Generally the mixed waste is sorted and removed from site on a daily basis.



The management system for site and the Fire Prevention and mitigation plan were readily available on site. Some Waste transfer Notes were provided for inspection - please ensure that the correct EWC code is recorded for all waste types on all waste transfer notes. Further guidance can be found on our website under:

- Guidance and advice -> Environmental Topics -> Waste management -> How to classify and assess waste.

EPR Compliance Assessment Report

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Operator/Permit holder	Huw Jones	Date	18/04/2019

Section 3 – Enforcement Response

You must take immediate action to rectify any non-compliance and prevent repetition. Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Section 4 – Action(s)

This section summarises the actions identified during the assessment along with the timescales for when they will need to be completed.

Criteria Ref.	CCS Category	Action required/advised	Due Date
See Section 1 above			
B1	C3	Move material to hardstanding or install sealed drainage system to service impermeable pad.	12/07/2019

Section 5 – Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- Advise on corrective actions verbally or in writing
- Require you to take specific actions verbally or in writing
- Issue a notice
- Require you to review your procedures or management system
- Change some of the conditions of your permit
- Decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you

- We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.
- Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and/or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- Ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- Ensure you comply with other legislative provisions which may apply

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance that could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- Offering/providing you with its literature/services relating to environmental matters
- Consulting with the public, public bodies and other organisations (eg. 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 its service
- Freedom of Information Act/Environmental Regulations request

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within fifteen working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with officer's line managers using the informal appeals procedure. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00 – 18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

Welsh Language

If you would like this form in Welsh please contact your Regulatory Officer.