

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

Site	Swansea Baling Plant	Permit Ref	QB3032RW	
Operator/Permit holder	City And County Of Swansea			
Regime	Waste Operations			
Date of assessment	15/08/2019	Time in	09:30	Out 11:30
Assessment type	Audit			
Parts of the permit assessed	A, B, C, F			
Lead officer's name	Morgan, David			
Accompanied by	Wakeford, Sally			
Recipient's name/position	Chris Fender/ Waste Manager	Date issued	19/08/2019	

### 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	A	
C1 - General Management - Staff competency/training	A	
C2 - General Management - Management system and operating procedures	A	
F3 - Amenity - Dust/fibres/particulates and litter	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.

<b>Number of breaches recorded</b>	<b>0</b>	<b>Total compliance score</b> (see section 5 for scoring scheme)	<b>0</b>
------------------------------------	----------	---	----------

**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

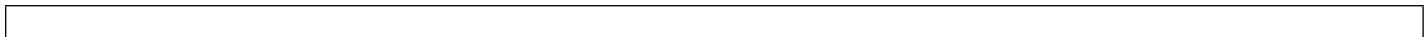
The site was inspected on 15 August 2019 at 9.30am by David Morgan and Sally Wakeford and were accompanied on site by Chris Fender.

The inspection was conducted following a period of very heavy rain and strong winds, it was dry and breezy on the day of inspection.

Notes from the inspection:

1. It is noted that there have been recent changes to contracts for the paper and cardboard on site. This has resulted in a back log of paper and card (green sacks). During the inspection it was noted a new process for sorting paper and card is being trialled – a debagging operation. If this activity becomes a permanent change to operations, please ensure the Environment Management System is updated to reflect this change.
2. You queried the requirements of the MRF regulations regarding this de-bagging operation and whether sampling of this would be required. As it is simply a debagging operation of one type of recyclate, the bag goes for disposal not recycling, and not separation of a mix of recyclates, there is no requirement for testing this under the MRF regulations.
3. At the time of the inspection general housekeeping onsite was not that of the usual high standard. This is likely to be a result of the unforeseen change to contracts for paper and card and the preceding weather conditions. Large quantities of paper are now stored loose. This did not appear to have an impact on the environment, nor did appear to have an impact on operations. However, please ensure that while there is a back log of paper and card on site that additional boundary checks are considered in order to prevent litter escaping site.
4. As discussed on site, following a review of the site's Fire Prevention and Mitigation Plan, there are outstanding actions for you to complete. Please refer to the Compliance Assessment Report ref: CAR\_0034372 (attached) for further detail on what additional information is required for the Fire Prevention and Mitigation Plan (FPMP). As mentioned in the Compliance Assessment Report, please provide a date by which the FPMP will be completed.
5. Following the inspection, we undertook an inspection of the site boundary. There are small amounts of litter at the base of the fence in certain areas. This is small scale and does not appear to have an impact on the environment or local amenity. However, please ensure regular checks include the boundary from outside the site.
6. No non-compliances with the permit were recorded during the inspection.

Thank you for providing the certificate of competency for Matthew Perkins and also the photograph and information of the replacement of the impermeable pavement in bays 3 and 4 of the waste reception hall.



## EPR Compliance Assessment Report

**Report ID:  
CAR\_NRW0035596**

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

Site	Swansea Baling Plant	Permit Ref	QB3032RW
Operator/Permit holder	City And County Of Swansea	Date	15/08/2019

### 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			

## 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](mailto: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.