Compliance Assessment Report

Report ID:
CAR_NRW0035718

This form will report compliance with your permit as determined by an NRW officer					
Site	A C D Skips Ltd	Permit Ref	CP3198FE		
Operator/Permit holder	A C D Skips Ltd				
Regime	Waste Operations				
Date of assessment	18/09/2019	Time in	14:30	Out	15:10
Assessment type	Site Inspection				
Parts of the permit assessed	All				
Lead officer's name	Bowder, Alex				
Accompanied by					
Recipient's name/position	Phillip Edwards/ Technically Competent Manager	Date issued	24/09/2019		

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	
B3 - Infrastructure - Site drainage engineering (clean and foul)	A	
B4 - Infrastructure - Containment of stored materials	A	
B5 - Infrastructure - Plant and equipment	A	
C1 - General Management - Staff competency/training	A	
C2 - General Management - Management system and operating procedures	A	
C3 - General Management - Materials acceptance	A	
C4 - General Management - Storage, handling labelling and Segregation	A	
F1 - Amenity - Odour	A	
F2 - Amenity - Noise	A	
F3 - Amenity - Dust/fibres/particulates and litter	A	
F5 - Amenity - Deposits on road	A	
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	A	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	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	**0**	**Total compliance score** (see section 5 for scoring scheme)	0

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

Officer Alex BOWDER attended ACD Skips Limited, Plot 42B, Brynmenyn Industrial Estate, Bridgend, CF32 9SQ at 14:30 on Wednesday 18th September 2019 to carry out an introductory inspection of permit **EPR-CP3198FE**. The weather conditions were warm and dry at the time of visit. Met with business representative Mr Phillip Edwards who accompanied Officer around the permitted area.

To remind the company following each visit Natural Resources Wales will produce a Compliance Assessment Report (CAR) detailing our comments from the inspection. If we substantiate reasonably foreseeable risks or actual impact to the environment, we can breach the business against your permit conditions which can affect your site banding and annual subsistence fees; this is scored on a Category 1 - 4 basis:

1 - Major, serious persistent and/or extensive impact on the environment/people/property

2 – Significant impact on effect on the environment/people/property

3 – Minor impact or effect on the environment/people/property

4 – A non-compliance which has no potential environmental effect

GENERAL OBSERVATIONS

The permitted site has not been visited since September 2018. The Officer was informed that the transfer station building was constructed in recent years - all waste streams were sorted and segregated within the unit at the time of inspection. The unit was built to accommodate stored wastes on site and to aid in protecting waste streams from the elements, which can affect material weight. Operations were functioning well with no permit breaches apparent throughput the inspection.

The Officer asked what the procedures are if hazardous waste is accepted with a load. It was stated that the material is flagged, rejected and returned to the source of collection. Asked about the business' plasterboard procedures and destinations.

Once wastes are segregated and separated, some material is sent to landfill for disposal. Any wood waste is sent to an authorised wood facility.

INFRASTRUCTURE

The drains are maintained on an ad hoc basis. There were no issues with the drainage system at the time

of inspection. There are slot drains at the front of the yard entrance that capture any run-off from the surface, which is then connected to the system. The site mentioned it possesses a consent to discharge to foul sewer. Also spoke about how the business operates a road sweeper to keep the road clear from residual dust and litter from the yard. This is expected as the site is in close proximity to the pavement and road side - it is good to see that the site is taking action to keep on top of this.

The infrastructure seemed in good condition with limited weakened areas. Please remember to restore damaged areas to uphold impermeable status. No skips or waste was stored outside the permitted boundary at the time of visit.



Image 1 – showing separated material within the transfer station building

ENVIRONMENT MANAGEMENT SYSTEM (EMS)
The Officer has asked for a copy of the site's EMS - this is being sent to NRW in due course. We will review this document in the new year.

FIRE PREVENTION AND MITIGATION PLAN (FPMP)
The business has submitted its FPMP to NRW. This will be assessed and given feedback with any amendments required.

TECHNICALLY COMPETENT MANAGER (TCM)
Phillip Edwards is the business TCM. WAMITAB valid until 07/03/2020. Mr. Edwards will be conducting his refresher course in 2020.

WASTE RETURN DOCUMENTS

The business submitted its Q1 2019 Return on 18/07/2019. It has been declared that 750 tonnes were accepted by the site and 635 tonnes removed. The site is classifying most of its waste as construction and demolition under EWC **17 __** codes.

If you have any issues with this report, please contact Alex Bowder on 0300 065 3394 or alex.bowder@naturalresourceswales.gov.uk

Thank you.

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

Cyfoeth Naturiol Cymru Natural Resources Wales	**EPR Compliance Assessment Report**	**Report ID: CAR_NRW0035718**

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

Site	A C D Skips Ltd	Permit Ref	CP3198FE
Operator/Permit holder	A C D Skips Ltd	Date	18/09/2019

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. 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.