

Compliance Assessment Report

Report ID:
CAR_NRW0035943

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

Site	Greens Recycling Centre	Permit Ref	SB3493HB			
Operator/Permit holder	Greens Recycling (Wales) Ltd					
Regime	Waste Operations					
Date of assessment	05/11/2019	Time in	10:30	Out	11:15	
Assessment type	Site Inspection					
Parts of the permit assessed	A, B, C, F and G					
Lead officer's name	Bowder, Alex					
Accompanied by	Warwick-Brown, David,Harris, Geraint					
Recipient's name/position	Andrew Green/ Director	Date issued	12/11/2019			

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	
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	X	
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
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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

Officer Alex BOWDER attended Greens Recycling Centre at Unit 28 Pontcynon Industrial Estate, Abercynon CF45 4EP at 10:30 on Tuesday 5th November 2019 to carry out an introductory inspection of permit **EPR-SB3493HB**. Officers David WARWICK-BROWN and Geraint HARRIS were also present for the inspection.

The weather conditions were mild and dry at the time of the visit. Met with business Director Mr. Andrew GREEN who showed the Officers around the permitted area and explained the operational procedures on site. Thank you for taking the time to go through operations.

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 - Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property

2 – Potential to have a significant impact or effect on the environment, people and/or property

3 – Potential to have a minor or minimal impact or effect on the environment, people and/or property

4 – Non-compliance at a regulated site that cannot foreseeably have any impact on the environment

PREVIOUS CAR FORM ISSUES

- Gabion rock wall – U1 waste exemption
- Waste stored outside of permitted boundary

GENERAL OBSERVATIONS

Greens Recycling (Wales) Limited operate a Standard Rules permit **SR2008 No 3** - household commercial and industrial waste transfer station with treatment – issued on 10 April 2014.

The site is located on a privately-owned road where the total quantity of waste accepted must be less than 75,000 tonnes a year. The permit requires all materials to be stored and treated on hardstanding or impermeable surface with sealed drainage; all waste materials were stored in this manner during the inspection.

The aim is to improve the quality of the inert waste entering site. There were various inert waste piles separated into different grades of aggregate product in the bottom section of the yard. There was no contamination of materials witnessed in the piles. 75 percent of the waste on site is classified as concrete, bricks and tiles.

The Officer asked what procedures are in place for identifying **hazardous waste** that is accepted with a load. It was stated that the material is highlighted, quarantined and rejected at the first instance. An appropriate contractor is contacted to take the material away if necessary.

The site had a crusher machine where they use the material as feedstock to reduce the size of aggregate materials. The end product is then used in construction for foundations etc. The site brings on machinery on an ad hoc basis to treat materials.

The business uses the area at the top of the yard for storage of empty skips. No waste material was being stored in any of the skips at the time of inspection.

SOIL TESTING AND ANALYSIS

All wastes aggregates on site are treated to WRAP Quality protocol for recycled aggregate standards. Sampling and soil analysis are conducted on each batch to ensure they meets the criteria for use as a non-waste. These records are forwarded to the customer.

The site forwarded a recent sampling report to the Officer for review - no issues noted with paperwork.

TRANSFER STATION UNIT

The unit is used to store and treat mixed waste. Staff conduct a visual assessment to separate the larger waste fractions before processing the remaining waste through a trommel. Material is brought onto site, bulked up within the unit and then taken to an authorised treatment facility, such as Bryn Quarry, for further processing.

Wood waste was stored in an appropriate manner away from other waste types. The Officer asked about the destination of the material – it was stated that it was taken to an appropriate facility. There were dust suppression methods on site with spraying water to limit amenity issues. The site has a Dust Management Plan from June 2017 which is comprehensive document for managing amenity issues.

TECHNICALLY COMPETENT MANAGER (TCM)

Phil Ridley is the designated TCM for the site, who has been away for a few weeks. The business displays his WAMITAB qualification in the office - with completed modules of hazardous and non-hazardous transfer stations with treatment. It has an expiry date of **15/04/2021**.

Please note the requirements to complete the continuing competency course once the expiry date has lapsed to keep the qualification valid.

ENVIRONMENT MANAGEMENT SYSTEM (EMS)

The business' Management System is kept on file in the office. The site sent through most current version May 2017. It was state that operations have not changed since the document was last updated - we will look to review the document on the next inspection.

FIRE PREVENTION AND MITIGATION PLAN (FPMP)

In 2017 the business was asked to produce a Fire Plan that is written in accordance with the FPMP guidance. The site produced a Version October 2019, this will be looked at more closely on the next inspection. Spoke about establishing a Quarantine Area within the yard – which is a designated section of the site that can hold 50% of the largest stockpile on site at all times.

ADVISORY NOTE

WASTE STORAGE - At the time of inspection, construction and demolition waste was being stored resting against the site boundary fencing. This section of the yard runs parallel to the road and the metal fencing angled towards the road. The site has stated that it intends to place concrete blocks along the fencing to act as a physical barrier between stored waste piles going forward.

ACTION: Please can the site remove material to establish a gap between stockpiled waste and the yard fencing. Please ensure this gap is maintained at all times.



Image 1 – showing waste material stored up against the site boundary – taken on 05/10/19

INFRASTRUCTURE AND DRAINAGE

The infrastructure within the permitted area was in a reasonable condition. The upper section of the yard is afforded with hardstanding rather than concrete. It was stated that only empty skips are stored in this

area, which was the case at the time of visit.

The Officer that mentioned the infrastructure in this area was not suitable for storage/treatment of waste – as run-off would not be fully captured by the drainage system.

If any areas of flooring become weakened or fractured, the site acts to repair damaged sections to see that the yard is fully sealed, and all run-off is captured by the system. There are two drainage gullies that lead up the hill that prevent surface water run-off coming onto the main site – no issues apparent.

The Officer asked about how often the interceptor system is maintained; it was stated approximately every eight months. A separate interceptor is found at the bottom of the site. There was a slightly broken French drain at site entrance, however this didn't seem to be affecting containment.

PERMIT SURRENDER

The business discussed the possibility of surrendering the permit in the future. If the company did decide to cease operating and apply to surrender the licence, further details can be found on our website for how to action this:

<https://naturalresources.wales/permits-and-permissions/waste/waste-permits/apply-to-surrender-a-waste-permit/?lang=en>

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In summary, to apply for the surrender of the permit you would be required to:

- Complete a Site Condition Report (SCR) – see website for further details
- Provide a general overview and summary from the CAR Forms to show record of no pollution.
- Include photos to show that the site is in a good condition and not contaminated in any way.
- Give a detailed site plan and clear the yard of any waste and litter.

WASTE RETURN DOCUMENTS

The Officer inspected various waste tickets in the office and the logged that showed the daily waste acceptance and removal. No issues were noted with the Duty of Care documents.

The business operates its waste collection by making customers select the waste type that is intended for the skip i.e. for inert or mixed waste. The business clearly states that they will not accept skips with asbestos or Japanese knotweed material. It is good to see that the Operator is filling out most current Waste Return document version that contains WAMITAB information.

The site submitted its Quarter 2 data for 2019 (July – September) on 11/10/19. Wastes are being correctly coded under a **17** __ code which constitutes construction and demolition wastes (including excavated soil from contaminated sites). It has been declared that 2,239 tonnes were accepted to the site in the last quarter, consisting of **17 01 07** mixed concrete, bricks, and tiles – and **17 02 01** - wood.

2,330 tonnes have been removed from site going out as **19 12 12** and various **17** __ codes. No unauthorised waste types were witnessed on site at the time of inspection.

I look forward to working with the site in future.

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

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0035943**

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Site	Greens Recycling Centre	Permit Ref	SB3493HB
Operator/Permit holder	Greens Recycling (Wales) Ltd	Date	05/11/2019

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			
C4	X	Remove material to establish a gap between stockpiled waste and the yard fencing. Ensure this gap is maintained at all times.	12/12/2019

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.