

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

Site	Lamby Way Open Windrow Composting Facility	Permit Ref	AB3096CP		
Operator/Permit holder	Welsh Water Organic Energy (Cardiff) Limited				
Regime	Installations				
Date of assessment	28/11/2019	Time in	10:40	Out	11:30
Assessment type	Site Inspection				
Parts of the permit assessed	Operations				
Lead officer's name	Harris, Geraint				
Accompanied by	Downes, Damien				
Recipient's name/position	Karl Pascoe/ Operations Manager	Date issued	03/01/2020		

### 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
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	C4	4.2.2 For the following activities referenced in schedule 1, table S1.1 (A1) A report or reports on the performance of the activities over the previous year shall be submitted to Natural Resources Wales by 31 January (or other date agreed in writing by Natural Resources Wales) each year. The report(s) shall include as a minimum: (a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;

**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>1</b>	<b>Total compliance score</b> (see section 5 for scoring scheme)	0.1
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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

### Welsh Water Organic Energy – AB3096CP

#### Purpose of Visit – 28/11/2019

#### Familiarise the new NRW Site Inspector, Geraint Harris.

Present; Karl Pascoe (Site Manager), Geraint Harris (Industry and waste Officer), Damien Downes (Environment Officer).

#### Site walkover

A site Induction was conducted prior to entering the operational area to ensure compliance with the sites Health and Safety Procedures. A site walkover was undertaken to familiarise the new NRW Site Inspector with the site's layout. The 8 week composting process was explained by the site manager Karl Pascoe of Freeland Horticulture Ltd. Freeland Ltd are contracted by Welsh water to operate the composting facility in Lamby Way. Upon entering the operational area, incoming material from Cardiff Council was being tipped towards the entrance of the site on the hard standing. It is in this area, Karl explained, that waste undergoes acceptance checks to determine its suitability for composting. If rejected, the local authority is notified within an hour and expected to remove it within 5 hours. A percentage of contamination (5%) is expected due to the variety of wastes collected in the green bins. Unsuitable wastes such as large plastic items, are physically removed prior to composting and placed in a large metal skip located by the site entrance. Waste is then formed into a batch with a shovel loader to form a new windrow. The newer material is at the entrance, with the oldest material being at the opposite end. At the time approximately half a new windrow had been constructed nearest the entrance. Older windrows of material were seen in differing degrees of decomposition depending on their progress throughout the site.

The batches are moved down the site as they are physically turned over to ensure an even compost. Once the 8 weeks has passed, the material is graded, shredded and screened to be sent out as a product. The process is designed to follow the PAS100 quality protocol. Woody material is segregated then re-added to improve compost structure.

At the rear of the site, the finer 10mm compost was being separated out during the site visit (Picture 1).

Picture 1

The feed stock for this separator could be seen to be producing a significant amount of steam but with relatively little odour. Plastic waste could be seen in each of the windrows and the feedstock. Additionally, the oversized compost being ejected from the separator contained plastic. Inspection of the 10mm stockpile showed very little sign of plastic contamination (Picture 2).

Picture 2

There was a considerable volume of 40mm compost stockpiled on site. These stockpiles contained a lot of plastic (Picture 3). Karl explained that these stockpiles have been building up while the site awaits a new 25mm separator. This separator, Karl informs me, should remove the majority of this plastic waste. The oversized compost will be shredded and readmitted to the windrow system to undergo additional composting.

### Picture 3

Photographic examples of rejected wastes were seen, which are used to train staff on waste acceptance procedures. Good records are retained on any rejected wastes, including composition and photographs of the waste in question. Rejection is based on both a percentage of inappropriate waste and the presence of any hazardous / problematic material.

I was shown pictures by Karl, of a previous time when compost was seen spilling over the boundary wall. This wasn't evident at the time of the inspection. Site should ensure that compost is only processed on the impermeable surface as stated in the permit.

### Records and permit limits

Records are retained to ensure compliance with the PAS100 protocol which is audited separately by Organic Farmers and Growers and the NFU. This benefits permit compliance, which also requires detailed records. Site tonnages appeared to be within limits although the site looks to be very full, Karl stated that they are now entering their quiet period and the attention of the site is more focus on processing the existing stocks.

The site is situated on a large concrete pad which drains into the centre to contain any runoff. This is then disposed via connection to DCWW sewer, under a discharge consent. I was shown a copy of the analysis for this discharge.

There was a mild compost odour on site which was not unpleasant to the officer.

Each pile of material has a unique number for traceability and is monitored for moisture and temperature.

### Yearly report

Your Permit requires the following:

**4.2.2** For the following activities referenced in schedule 1, table S1.1 (A1) A report or reports on the performance of the activities over the previous year shall be submitted to Natural Resources Wales by 31 January (or other date agreed in writing by Natural Resources Wales) each year. The report(s) shall include as a minimum:

(a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;

As part of your permit you are required to complete a yearly report on the performance of your site. This is an example of the 2017 report:

*4.2.2(a) The annual reports show a successful first year of operations for the OWC plant. The OWC has received green waste from Cardiff and Vale councils since April. With training and site procedures, the contents and contamination of the waste received by the collection vehicles has improved massively as the year has progressed.*

*Water usage data is unavailable due to metering issues on the site, with the supply coming unmetered from the Cardiff City Council Lamby Way Tip. I have requested that action should be taken on this with a meter install on the site to monitor future water usage.*

*Pas 100 was achieved in October of 2017 to allow the site to start sending out compost as a product. There is currently 8000 Ton of waste in windrows at the site that will slightly reduce in early 2018 as more product reaches the required specification.*

Please provide the following review of the results for 2018 as requested in 4.2.2(a) of your permit.

**Actions**

Site to undertake a daily check for compost material spilling off the sites impermeable surface due to the amount of compost onsite.

Site to inform NRW when 4Recycling are due to collect their next quantity of compost from Freeland to spread to land so that this maybe observed.

Site to provide the 2018 report as requested above.

**Conclusion**

There were no significant issues found during this visit. There is one recommendation made.

**2<sup>nd</sup> December Visit**

Visited site again on the 3<sup>rd</sup> December with Environmental officer Edward Davies. Site were undertaking the process of extracting the 40mm compost from their stockpiles. The extracted compost showed little sign of plastic pollution Picture 4. The resulting product was being stockpiled for future use , via 4Recycling, to farmland.

Picture 4

END

## EPR Compliance Assessment Report

**Report ID:  
CAR\_NRW0036138**

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### 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.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

### 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			
G4	C4	Provide an overview of 2018.	31/01/2020

## 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.