

Compliance Assessment Report

Report ID:
CAR_NRW0035929

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

Site	I Wood Renewables Ltd	Permit Ref	FP3095ET			
Operator/Permit holder	I Wood Renewables Ltd					
Regime	Waste Operations					
Date of assessment	23/10/2019	Time in	14:00	Out	16:00	
Assessment type	Audit					
Parts of the permit assessed	3.8.1, 1.1.1, 4.2.2,					
Lead officer's name	Thomas, Ffion					
Accompanied by						
Recipient's name/position	Kevin Burke/ Director and site manager	Date issued	07/11/2019			

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	
	A	
B3 - Infrastructure - Site drainage engineering (clean and foul)	A	
	A	
D2 - Incident Management - Accidents, emergency and incident planning	A	
	A	
G2 - Monitoring and Records, Maintenance and Reporting - Records of activity, site diary/journal/events	A	
	A	
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	A	
	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

This Compliance Assessment Report was completed following a site meeting held on 23 October 2019. The meeting was held to undertake a site inspection and to review actions assigned from the previous CAR form ref CAR-NRW0035811.

I Wood Renewables (IWR) had provided written response to the action assigned in CAR form 0035811 via email on the 22/10/19

NRW can confirm that the actions assigned in CAR NRW-0035811 have been completed.

The FRS are being consulted on the updated version 3 of the FPMP received via email on 30th October 2019 and considering the comments received on 22nd October 2019.

Once comments are received from the FRS audit compliance of the permit condition can be confirmed.

Site meeting:

During the inspection other written procedures and documents were assessed. All requests for documents were met and documentation readily available in files held on site at the offices.

An updated version of the sites EMS has been provided. This update has seen changes to the document to reflect the actual operations on site now that IWR are the operators and reflects the changes to waste management on site e.g. no longer storing wood within a building.

IWR also re-forwarded electronic copies of appendices associated with the EMS, i.e dust management and noise management plans. These have now been saved to the site file and are available under the public register.

The daily check sheets for the site were reviewed. The documents viewed had several environmental checks listed and signed and dated confirming the check had been carried out. Normally the checks are undertaken by Kevin Burke, but other staff on site are also trained and

competent in undertaking the task. The daily check sheets also included notes of any additional maintenance activities, issue related to stock acceptance and down time o the outlet point. A sketch drawing was also included on the daily checks illustrating the stock pile locations and changes in rotation. This was a handy addition and helps to illustrate the movement of waste and changes to quantities held on site.

A site walk over:

At the time of the inspection the Margam Biomass plant was off line. IWR were nearing their permitted capacity. IWR had therefore ceased to accept waste into site.





It was very reassuring to see that IWR had ensured 360 access to the wood piles on site.

Measurements of the stockpiles was not undertaken during this inspection (as the officer had no access to her measuring equipment at this time) As no further inputs were being received until Margam was back operational IWR were utilising the time to undertake maintenance activities of the plant and site.

Example of this maintenance work undertaken included the emptying of silt build up in the site sealed drainage system. The sump beneath the cattle grid at the site entrance receives all site run off due to the falls of the sites impermeable pad. The run off is then pumped, via a float pump, into IBC's stored within the sealed drainage system. The water is often recirculated to act as dust suppression on the plant/equipment during shredding activities and on the stock piles/yard in dry weather conditions.

Within the site weighbridge certificates and documentation relevant to the permit and site activities are displayed.

CCTV is in operation on the site 24hrs a day. The footage is recorded and retrievable on request.

No Non compliances were identified during the site inspection.

A desk top review of waste returns was undertaken on the 7th November 2019. The returns indicate that more waste has been removed again this quarter than received. This has been consistent throughout 2019 with tonnages for Q1 – Q3 showing more waste removed than received. The outlets have been to Neath Port Talbot (Margam biomass) and to Wrexham or Derbyshire (believe to be the chip board manufacturers)

Email proactively sent by IWR was received on 4th November illustrates the change to sites storage. The email detailed how the Margam site had returned to operational status and IWR had been able to remove near to all waste wood from site. Photographs were attached and have been included below.



NRW appreciate being kept informed in this manner of the activities occurring at IWR as markets swiftly change.

END

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EPR Compliance Assessment Report

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Operator/Permit holder	I Wood Renewables Ltd	Date	23/10/2019

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.