

## Compliance Assessment Report

Report ID:  
CAR\_NRW0036016

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

|                              |                           |             |            |     |       |  |
|------------------------------|---------------------------|-------------|------------|-----|-------|--|
| Site                         | Unit 2, Sea View Bungalow | Permit Ref  | WP3495EH   |     |       |  |
| Operator/Permit holder       | Anthony Parsons           |             |            |     |       |  |
| Regime                       | Waste Operations          |             |            |     |       |  |
| Date of assessment           | 29/11/2019                | 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               |                           |             |            |     |       |  |
| Recipient's name/position    | Anthony Parsons/ Director | Date issued | 03/12/2019 |     |       |  |

### 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            |                       |
| F4 - Amenity - Pests/birds and scavengers                                                                      | 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 | X            |                       |

**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 Sea View bungalow at 10:30 at Unit 2 Sea View Bungalow, Peterstone, Cardiff, CF3 2TN on Friday 29 November 2019 to carry out an introductory inspection of permit **EPR-WP3495EH (EAMWL 100124)**. The weather conditions were mild and dry at the time of the visit. Met with business Director Mr Anthony Parsons who showed the Officer 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**

- Storage of waste outside the permit boundary

## GENERAL OBSERVATIONS

Mr Anthony Parsons runs a Household, Commercial and Industrial Waste Transfer Station with treatment at Unit 2 Sea View Bungalow, CF3 2TN. This permit was issued used in 2008 and the inputs are limited to non-hazardous waste materials. The total quantity of waste accepted must be less than 5,000 tonnes a year and the permit require all materials to be stored and treated impermeable surface with sealed drainage.

The business trades as 121 Skip Hire and largely collects from waste removal activities and family-connected waste carrier services. Materials are mainly collected from household clearances - no external companies tip in the yard, for instance.

Operations have waste streams tipped in the yard which are then sorted and segregated into their respective piles. There are designated skips for wood, metal, cardboard, plastic along with piles of inert and hardcore and green waste. These materials are brought onto site, bulked up and then taken to an authorised treatment facility 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 is was taken to an appropriate facility. Space on site is limited and so it is essential to conduct good housekeeping within the yard at all times.

No hazardous waste such as asbestos was witnessed and there was no contamination of materials in the piles at the time of inspection. An appropriate contractor is contacted to take any rejected material away if necessary.

The business uses the area in front of the yard entrance as a storage area for empty skips and vehicle parking for staff. The area is classed as a hardstanding flooring and the Officer spoke about the unsuitability of using this area as waste storage/treatment area; the Operator fully understood this. No waste material was being stored in any of the skips at the time of inspection.

The unit behind the storage area used for vehicle maintenance and parts.

### TECHNICALLY COMPETENT MANAGER (TCM)

Anthony Parsons is the designated TCM for the site. The WAMITAB qualification we have on file is linked to a non-hazardous waste transfer station module with an expiry date of **20/02/2020**. If this is an old qualification, please can the business send the updated certificate to us.

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 not kept on site - please ensure this is kept up-to-date with site activities and amended accordingly. The Working Plan on file shows a site-based document that address operations within Sections 1 to 6. We may look to update and expand this document in 2020.

## **INFRASTRUCTURE AND DRAINAGE**

The infrastructure flooring within the permitted area was in a reasonable condition with no obvious fractures apparent. The Officer that mentioned the infrastructure outside of the gates was not suitable for storage/treatment of waste, as run-off would not be captured by the drainage system.

The site has a drainage gully that runs through the centre of the yard. This leads to an interceptor that is dug into the ground. This is connected to a nearby suction tank where a visual assessment is conducted to maintain the system on a daily basis. When the system is overflowing, the suction tank is used to remove water from the system. When full, this is taken away by an appropriate contractor.

Please continue to monitor the drainage/runoff storage tank, which should be emptied regularly to ensure it doesn't overflow. Please keep records of how and where this liquid is disposed to.



Image 1 – showing the interceptor system and drainage gully

#### **ADVISORY NOTE**

1. At the time of inspection, there was tree cutting stored up against the tree boundary with skips amongst the material. This pile was quite high and does not demonstrate good housekeeping.
2. Two empty skips were being stored on top of skip filled with waste. Skips should not be stored on top of filled units as this presents a health and safety risk.

#### **ACTION**

**Please can the site remove the tree cuts and ensure skips are not stored on top of filled units in future.**



Image 2 – showing tree cutting stored on site next to the tree line

## WASTE RETURN DOCUMENTS

The business submitted its Quarter 3 for 2019 document on 20/10/19. It was declared that 403 tonnes were received and removed by the site - classified as general waste, hardcore mixed, cardboard, wood, metal and green waste.

### **ACTION**

When filling out the information page of the Waste Return document, **please can the Operator fill out the WAMITAB details on section 2.5 Technically Competent Management of the spreadsheet.**

No other issues apparent with the return document. 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](mailto: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\_NRW0036016**

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

|                        |                           |            |            |
|------------------------|---------------------------|------------|------------|
| Site                   | Unit 2, Sea View Bungalow | Permit Ref | WP3495EH   |
| Operator/Permit holder | Anthony Parsons           | Date       | 29/11/2019 |

### 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 |              |                                                                                                                |            |
| G4                  | X            | Fill out the WAMITAB details on section 2.5 Technically Competent Management of the Waste Returns spreadsheet. | 03/01/2020 |
| C4                  | X            | Remove tree cuttings and ensure skips are not stored on top of filled units in future.                         | 03/02/2020 |

## 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.