

Compliance Assessment Report

Report ID:
CAR_NRW0036428

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

Site	Roath Dock Treatment and Recycling Centre NRW/EPR/LP3439HM/V003	Permit Ref	LP3439HM			
Operator/Permit holder	Castle Waste Services Limited					
Regime	Installations					
Date of assessment	03/03/2020	Time in	10:30	Out	13:30	
Assessment type	Unknown					
Parts of the permit assessed	Site handover to Geraint Harris					
Lead officer's name	Green, Rebecca					
Accompanied by	Harris, Geraint					
Recipient's name/position	David Humpriss/ Technical Director	Date issued	10/03/2020			

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
A1 - Specified by permit	A	
B4 - Infrastructure - Containment of stored materials	A	
C2 - General Management - Management system and operating procedures	A	
C4 - General Management - Storage, handling labelling and Segregation	A	
E3 - Emissions - Surface water	A	
E4 - Emissions - Sewer	A	
E5 - Emissions - Waste	A	
F1 - Amenity - Odour	A	
F2 - Amenity - Noise	A	
F5 - Amenity - Deposits on road	A	
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	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

The purpose of this visit was to hand over site regulation under The Environmental Permitting Regulations (EPR) from Rebecca Green to Geraint Harris.

Present at the meeting were -

David Humphriss, (DH), Technical Director, Castle Environmental, (CE);

Derek Wilkins, (DW), Site Operations Manager, CE;

Geraint Harris, (GH), Senior Officer, Industry Regulation, Natural Resources Wales (NRW);

Rebecca Green, (RVG), Senior Officer, Industry Regulation, NRW.

NRW is moving towards place-based regulation and have divided Wales into six areas. Castle are based in the south central area but the current regulatory officer is based in the south east area, hence the need to transfer the regulatory responsibilities to an officer who is based in the south central area.

There are two businesses on site; the waste treatment business is regulated under EPR, the block manufacturing business is not.

We were given a business update. DW has just been appointed and is settling into the position. He will be NRW's primary contact.

CE are planning significant investments on this site in the next six to eighteen months. These will include new filter presses, re-siting some of the treatment tanks and resurfacing the area under the filter presses.

The area under the filter presses is in a very poor condition, the surface is uneven and holds water, meaning that any filter cake from the presses is landing in water and so ends up being wetter than when it came out of the filter press. This state of affairs is most unsatisfactory and should be remedied as a matter of urgency. The equipment in other parts of the waste treatment area is showing its age and will benefit enormously from the planned investments.

CE have a very useful laboratory and are planning to buy an atomic absorption spectrophotometer (AAS) in the near future. The new laboratory manager is also improving the systems and layout of the laboratory.

The remainder of the site was acceptable and the new block manufacturing area was well laid out, clean and tidy.

There was a lot of very watery grey residue on the road outside the site which had presumably been washed there by the recent storms. CE should try to keep it a little cleaner.

GH went through the permit conditions, explaining how NRW interpret them and what NRW expect in order to verify compliance. CE were advised to decide whether they need any changes to their permit, before the variation to reflect the publication of the BAT conclusions is issued, as these could be added at the same time.

The Environment Agency consultation "Appropriate measures for permitted facilities that take waste" was discussed. This guidance is designed to replace the existing sector guidance note following the publication of the BAT conclusions for waste treatment. NRW have not yet indicated whether they intend to adopt this guidance. CE have grave concerns about being forced to reveal the source of the waste at pre-acceptance as this may have implications for commercial confidentiality.

END.

--

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0036428**

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

Site	Roath Dock Treatment and Recycling Centre NRW/EPR/LP3439HM/V003	Permit Ref	LP3439HM
Operator/Permit holder	Castle Waste Services Limited	Date	03/03/2020

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			

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.