

## Compliance Assessment Report

Report ID:  
CAR\_NRW0036528

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

Site	Llantrisant Recycling	Permit Ref	AB3092FR		
Operator/Permit holder	Llantrisant Recycling Centre Limited				
Regime	Waste Operations				
Date of assessment	05/03/2020	Time in	N/A	Out	N/A
Assessment type	Check Monitoring/Sampling				
Parts of the permit assessed	Monitoring				
Lead officer's name	Tye, Laoni				
Accompanied by	Neil Davies				
Recipient's name/position	Tom Prichard and Gareth Danter-Hill/ Director and TCM	Date issued	04/05/2020		

### 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
G1 - Monitoring and Records, Maintenance and Reporting - Monitoring of emissions and environment	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

Review of periodic ambient bioaerosol monitoring report submitted on behalf of Llantrisant Recycling Centre (LRC) Limited for their open windrow coposting (OWC) operation, required as part of their permitted A1 activity operating conditions. The monitoring was carried out on the 15th November 2019, the report was reviewed on the 5th March 2020. The results were found to be in line with the limits set within the permit and was therefore considered compliant. Comments are provided on the report below.

1.1 The site is situated to the north of the Royal Mint, adjacent to the Nant Muchudd and is surrounded primarily by agricultural and wooded areas. To the south lie industrial facilities and the Llantrisant Dialysis Centre with the nearest workplace<sub>2</sub> and residential<sub>3</sub> receptors located approximately 27 m to the south & 87m to the southwest of the working area boundary.

1.2 The OWC operation has a maximum capacity of 7,500 tons per annum and is located adjacent to the northern end of the sites south east boundary. Final product and un-shredded green waste are stored immediately to the north east of the OWC area.

1.3 Ambient bioaerosol monitoring was carried out between 08:05 and 12:10 on the 15<sup>th</sup> November 2019. Sampling was carried out in triplicate at four locations using single stage Andersen Samplers with three sample points downwind (DW) of the OWC area and a single upwind (UW) sample point to the north of the composting area in accordance with the requirements of TGN M9. Meteorological data was measured both upwind and downwind of the OWC area.

1.4 The submitted report states that sampling for ambient bioaerosols associated with emissions from the OWC were carried out in accordance with the Environment Agency's Technical Guidance Note M9<sub>4</sub> (TGN M9).

1.5 Measured bioaerosol concentrations at receptors have been compared against guideline threshold values previously recommended by the Environment agency for mesophilic bacteria and *Aspergillus fumigatus* of 1000 cfu/m<sub>3</sub> and 500 cfu/m<sub>3</sub> respectively.

## 2 Results

2.1 Sample locations were determined using meteorological data measured on site and conformed to the "fan like" arrangement specified in TGN M9. DW sample and meteorological measurement locations were downwind of the nearest workplace sensitive receptor location and upwind of the nearest residential receptor.

2.2 Reported mean wind speed during sampling for mesophilic bacteria was 1.4 m.s<sup>-1</sup> at the DW

sample locations while at the UW sampling location, mean wind speed was 3.5 m.s<sup>-1</sup>. During sampling for *Aspergillus fumigatus*, mean wind speed during sampling for mesophilic bacteria was 1.4 m.s<sup>-1</sup> at the DW sample locations while at the UW sampling location, mean wind speed was 4.0 m.s<sup>-1</sup>.

2.3 Mean relative humidity (RH) was 73% at the DW sample location and 78% at the UW sample location. Mean temperature was 8°C at the DW sample location and 7°C at the UW sample location. Mean wind direction at the UW sample location ranged between 211° & 224° from north during sampling and between 144° & 163° from north at the DW sampling location. No precipitation was reported for the 24 hours prior to sampling.

2.4 Site activities during sampling were recorded and included soil deposition adjacent to the composting area and screening of inert glass waste. No activities likely to result in the highest airborne bioaerosol concentrations, i.e. turning, shredding and screening etc., coincided with the sampling period (see Sections 3.6 of this report).

2.5 The maximum median DW concentration of mesophilic bacteria was higher than the median UW concentration measured during sampling with both less than 1000 cfu/m<sup>3</sup>.

2.6 The maximum median DW concentration of *Aspergillus fumigatus* was higher than the median UW concentration measured during sampling with both less than 500 cfu/m<sup>3</sup>.

### 3 Comments

3.1 The submitted report states that local meteorological data was measured at both UW and DW sampling locations at a height of approximately 1.6m above ground level. Results indicate that local wind vector flow between UW and DW areas varies considerably and is likely a result of local topography. AQMRAT agree that measured differences are likely due to the influence of local topography and TGN M9 explicitly acknowledges that site topography could have an impact on local wind vector flow (see for example Box 5.2 in Section 5.2.5 of TGN M9).

3.2 It is not possible to determine if the height of wind measurements reflects the effect of topography on wind vectors at higher altitudes above ground level or whether measured differences in wind vectors are likely to have had a significant impact on transport and dispersion of bioaerosols in this instance.

3.3 Measurement intervals for all meteorological data meet or exceed the requirements of TGN M9 Section 5.3.1.

3.4 Due to safety and logistical considerations, sample locations downwind of the OWC area were also downwind of the community recycling centre (CRC) identified as the closest workplace receptor. The closest point of the CRC boundary to the composting area was located approximately 60m UW of the DW sampling location (DWC) where the maximum mesophilic bacteria measurement was made and 80m UW of the DW sampling location (DWD) where the maximum *A. fumigatus* measurement was made. While the position of DW sample locations may therefore underestimate impacts at the closest workplace sensitive receptor, due to the relatively low concentrations and small distances involved it is unlikely to represent a significant risk in this instance. However, it should be noted that the CRC may itself be a source of bioaerosols.

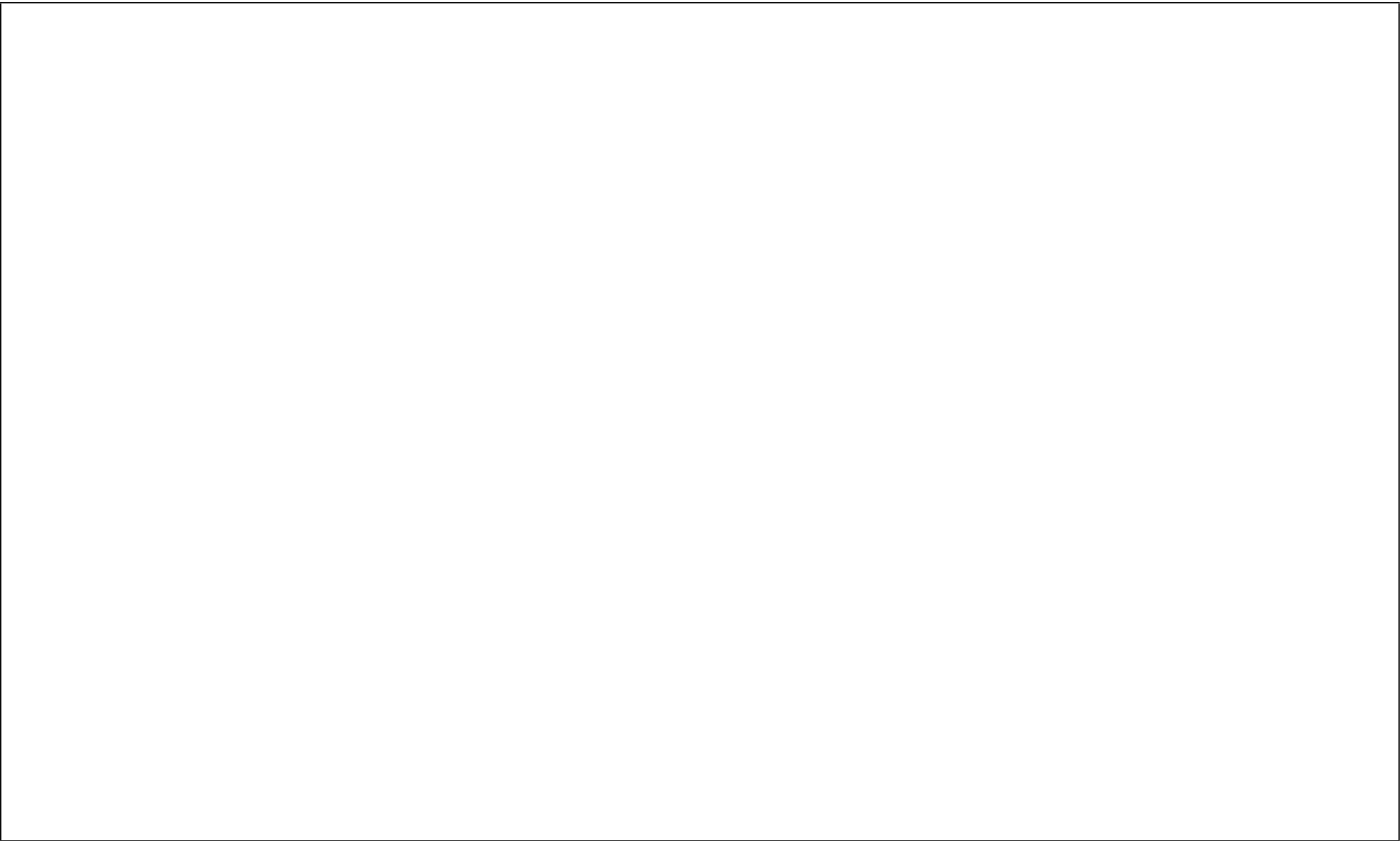
3.5 Sampling at all four locations can be considered to have occurred concurrently in accordance with the definition in Section 5.2.6 of TGN M9. Sampling duration and flow rate meet the requirements of TGN M9.

3.6 In order to assess bioaerosol impacts at receptors, composting activities such as material shredding, screening and windrow turning are expected to be undertaken during the sampling period. However, on this occasion NRW recommended that sampling could be conducted whilst no activity was taking place and wind direction was towards the nearby receptors to give an idea

of levels during 'normal operations'.

3.7 The operator's risk management tool requires that no active composting processes are undertaken when prevailing winds are likely to transport bioaerosols towards the nearest receptor. The operator needs to be able to demonstrate that mitigation measures based on restriction of operational processes continue to be implemented as required e.g. auditable records of site wind direction and site activity logs etc.

3.8 Sample storage, transport, culture methodology and colony enumeration meet or exceed the requirements of TGN M9. Individual plate counts are included in the submitted report which meets the reporting requirements of TGN M9 in full.



## EPR Compliance Assessment Report

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Operator/Permit holder	Llantrisant Recycling Centre Limited	Date	05/03/2020

### 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](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.