

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

Site	Cowbridge Compost Ltd	Permit Ref	BP3095SR		
Operator/Permit holder	Cowbridge Compost Ltd				
Regime	Waste Operations				
Date of assessment	30/10/2017	Time in	10:00	Out	12:00
Assessment type	Site Inspection				
Parts of the permit assessed	Specified Activities, Infrastructure, Management, Emissions.				
Lead officer's name	Ward, Adam				
Accompanied by					
Recipient's name/position	John Homfray / Mike Hallet/ Director / TCM	Date issued	18/12/2017		

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	
B4 - Infrastructure - Containment of stored materials	A	
C3 - General Management - Materials acceptance	A	
C4 - General Management - Storage, handling labelling and Segregation	A	
D1 - Incident Management - Site security	A	
E1 - Emissions - Air	A	
E5 - Emissions - Waste	A	
F1 - Amenity - Odour	A	
F3 - Amenity - Dust/fibres/particulates and litter	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
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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

Introduction

This visit on 30th October was conducted as part of the regular compliance inspections required throughout the year. Thank you for taking the time to show us around your facility.

Senior Environment Officer Adam Ward met with John Homfray (Director) and Mike Hallet (Manager and TCM). Site activities were discussed and you explained that waste throughputs had significantly reduced in early 2017, but had recently started to pick back up again. New contracts for green waste now mean that approximately 15,000 tons of waste will be processed in Open Windrow Composting (OWC) *only*.

IVC Inspection

The In Vessel Composting (IVC) building was inspected and it was confirmed that currently no waste is being stored at the facility. The internal infrastructure has been thoroughly cleaned via jet wash and may be used for alternative storage in future.

You explained that 3rd party customers may wish to use the IVC building for a temporary storage / bulking up operation for household, industrial and commercial waste streams, such as food and plastics. This would constitute a change in activity of the IVC (from biological treatment only) and therefore a normal variation to add additional activities would be required. A pre-app record document with additional guidance for applying to vary your permit was sent to you via email on 9th November 2017.

OWC Inspection

The OWC area was inspected and there were large stockpiles of green waste being stored in batch formation (for compliance with PAS 100 requirements) and were various stages of the composting process.

Although the IVC process is no longer operational, you are still required to have identifiable sanitations and stabilisation stages of OWC. Please ensure that you continue to monitor oxygen, moisture and most importantly, temperature levels of the compost to ensure you are compliant with your permit, management

systems and composting best practice. This will reduce the risk of emissions such as odour and bio-aerosols and ensure that the compost process is as efficient as possible.

Areas of concrete that were damaged and highlighted at the last site inspection (21st September 2016) have now been repaired. Thank you for your cooperation on this matter. You are encouraged to continue to ensure that all areas used to store and treat waste benefit from an impermeable surface and sealed drainage system. This include any drainage ditches that lead to the leachate lagoon.

EMS/OMP Updates

As the operations have now changed significantly on site, you are required to update your written procedures accordingly. This will include signifying the postponement / change of use of the IVC building and the move to OWC only. You should demonstrate how you currently ensuring compliance with permit condition and additional guidance for composting to be able to demonstrate sanitisations and stabilisation phases. Please submit updated written procedures within 3 months of this CAR form.

Odour Complaints

Odour complaints for Cowbridge Compost have reduced significantly over the last 24 months, thanks to several factors such as significantly improved management procedures and infrastructure and reductions in waste volumes, particularly the removal of food waste from the operation.

However, we have received occasional complaints regarding the facility in the last 12 months. While an officer has not attended to investigate, you have performed internal investigations and conducted odour assessments in the area. Some of these complaints have therefore been attributed to landspreading in the area.

Please ensure you remain vigilant and continue to follow procedures specified by the EMS and OMP, such monitoring weather conditions before trommelling. While green waste composting poses a reduced risk of mal-odorous emissions, anaerobic pockets of compost can still cause an issue to nearby sensitive receptors. However, it is envisaged that your continued management practises should keep the risk of odour emissions low in future.

If you have any questions regarding this Compliance Assessment Report (CAR) form, please contact Adam Ward on 03000 653149 or via email on adam.ward@naturalresourceswales.gov.uk

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0032623**

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Operator/Permit holder	Cowbridge Compost Ltd	Date	30/10/2017

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.