

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

Site	Worldcare Wales Ltd	Permit Ref	UP3794FZ		
Operator/Permit holder	World Care (wales) Ltd				
Regime	Waste Operations				
Date of assessment	14/05/2018	Time in	14:05	Out	15:20
Assessment type	Site Inspection				
Parts of the permit assessed	As below				
Lead officer's name	Thomas, Rhys				
Accompanied by	Briscoe, Ross				
Recipient's name/position	Lee Jones/ TCM	Date issued	01/06/2018		

### 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	C3	1.1.2
B1 - Infrastructure - Engineering for prevention and control of emissions	C3	2.1.2
B4 - Infrastructure - Containment of stored materials	C3	4.6.1
B5 - Infrastructure - Plant and equipment	A	
C3 - General Management - Materials acceptance	A	
C4 - General Management - Storage, handling labelling and Segregation	C3	1.1.4
E1 - Emissions - Air	A	
E2 - Emissions - Land and groundwater	A	
E3 - Emissions - Surface water	A	
E5 - Emissions - Waste	A	
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	

**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.

<b>Number of breaches recorded</b>	<b>4</b>	<b>Total compliance score</b> (see section 5 for scoring scheme)	16
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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

Routine unannounced inspection carried out by Environment Officer Rhys Thomas and Senior Environment Officer Ross Briscoe. Officers were accompanied on site by TCM Lee Jones.

Officers initially proceeded to site office where discussions took place surrounding the requirement for a Fire Prevention and Mitigation Plan (FPMP) to be in place. As discussed, your permit was varied on 9<sup>th</sup> March 2018 to include a condition (5.7) requiring activities to be managed in accordance with a written fire prevention plan. In line with the Improvement Programme (1.7.2) outline in the permit variation, the written Fire Prevention and Mitigation Plan should be submitted to Natural Resources Wales 3 months after permit issue. The FPMP should therefore be submitted to Natural Resources Wales by 9<sup>th</sup> June 2018.

Discussions took place regarding the yard adjacent to the permitted area that is currently being used to store waste under registered exemptions. A consultant has been instructed to work on a permit variation, with the intention of extending the current permit boundary to include part of the adjacent yard. Activities will need to comply with the relevant exemptions criteria until a permit variation to include this area is issued.

Officers proceeded to carry out a site walkover. Site was busy at time of inspection with waste being received on site and processing/sorting activities taking place. It was good to see that work has been carried out the site surfaces since the last site inspection on 06/03/2018. A new concrete pad has been constructed in the area between the trommel and wood storage bay, towards the middle of site. This has greatly improved the condition of the surface in this part of site. Operator is also in the process of improving the storage bays beneath the picking line by installing steel extensions on the front of the bay walls. One of these was already in place at time of visit. This work should improve the containment of waste in this part of site.

At time of inspection there was a lot of waste stored on site. The amount of mixed waste stored in the bay behind the trommel appears to have increased and is spilling out beyond the front of the bay. Similarly, the residual waste bay was full with materials overflowing from the top and from the front of the storage bay. The amount of wood stored within the wood storage bay was compliant, however the side of the bay wall next to the exempt yard has been damaged and is no longer fit for purpose.

There remains a large amount of soil stored on the hardstanding area towards the back of site. As was the case during the last site inspection (06/03/2018), the presence of this soil is preventing access to the bays along the back of site. It could be seen that there are still fridges / freezers stored in the storage bays at

the back of site. It also appeared as there was still a large amount of plasterboard stored at the far corner of site.

The following breaches of permit conditions have been noted:

**A1 Permitted Activities - Specified by Permit. Permit Condition 1.1.2 CCS Score C3.**

During the inspection it was noted that waste material was being stored outside of the permitted area. A stockpile of trommel fines was located on the adjacent storage yard, outside the permitted area. Although this area benefits from registered waste exemptions, none of these exemptions allow the storage of trommel fines (EWC 191212). This waste is associated with permitted activities and has emanated from the permitted site therefore is recorded as a breach of permit conditions. This non-compliance has been scored a CCS C3 as the breach could foreseeably result in minor pollution.

**Action:** Ensure all activities associated with permitted activities are stored within the boundary of the site permit.

**B1 Infrastructure – Engineering to control emissions. Permit condition 2.1.2 CCS Score C3.**

Permit condition 2.1.2 (Table 2.1(e)) sets standards for fixed bays and other fixed containers. All fixed bays and other fixed containers used for the storage and treatment of wastes must be constructed and maintained to a standard, which is fit for purpose. During the inspection it was noted that the bay wall for the wood storage bay was damaged and was not fit for purpose at the time as wood had spilled out of the bay on to the adjacent exempt yard. This non-compliance has been scored a CCS C3 as the breach could foreseeably result in minor pollution.

**Action:** Wood storage bay wall must be repaired and maintained so that it is fit for purpose.

**B4 Infrastructure – Containment of stored materials. Permit condition 4.6.1 (table 4.6) CCS Score C3.**

During the inspection it was noted that fridges/ freezers are still being stored in the bays at the back of site. Such refrigeration equipment should not be stored here as this area does not benefit from the required infrastructure. Table 4.6 (i) requires refrigeration equipment to be stored on an impermeable pavement with sealed drainage, in accordance with permit condition 2.1. This non-compliance has been scored a CCS C3 as the breach could foreseeably result in minor pollution.

**Action:** Ensure all fridges / freezers are stored in bays or containers that meet the requirements set out in table 4.6(i).

**C4 General Management – Storage, Handling, Labelling and Segregation. Permit condition 1.1.4 (table 1.1.). CCS Score C3.**

Wastes are not appropriately stored within bays and containers as is required by permit condition 1.1.4. The mixed waste stockpile and residual waste stockpile are both beyond capacity and are spilling out of

their designated bays. The volume of waste stored on site at time of inspection was beyond the capacity of the infrastructure that is in place, and volumes need to be reduced to bring the activities back into compliance. This non-compliance has been scored a CCS C3 as the breach could foreseeably result in minor pollution.

**Action:** Ensure all waste on site is stored within skips and bays as required in the permit.

During the inspection officers also visited the adjacent yard used for storing waste under registered exemptions. There were several issues evident in this area where activities were not being carried out in accordance with the exemptions criteria. This area of site is outside the permit boundary and separate correspondence has been sent detailing the issues on this yard. Please remember that all waste that is moved from the permitted site to the exempt yard needs to be recorded. You must also ensure that the waste types can be stored under the registered exemptions and be familiar with all the key conditions and criteria of the exemptions, including storage requirements, time and quantity limits.

Please take note of the non-compliances recorded above and the actions required. As discussed during the inspection, Ross Briscoe will be taking over as regulating officer for the site. If you would like to discuss anything mentioned in this report please contact 03000 65 3675, [ross.briscoe@cyfoethnaturiolcymru.gov.uk](mailto:ross.briscoe@cyfoethnaturiolcymru.gov.uk)

#### **Photographs:**

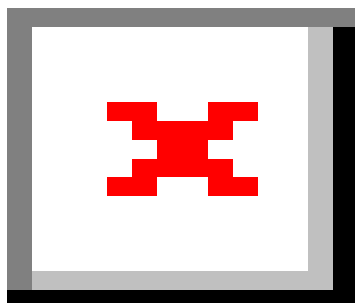


Photo 1: General view of site from site office. Mixed waste stockpile (behind trommel) not contained within the bay.

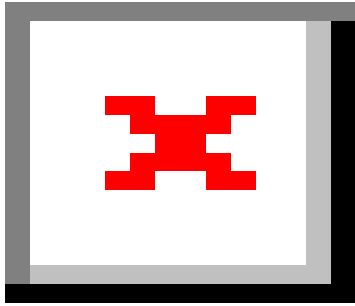


Photo 2: Storage bays beneath picking line. These bay walls are in process of being extended.

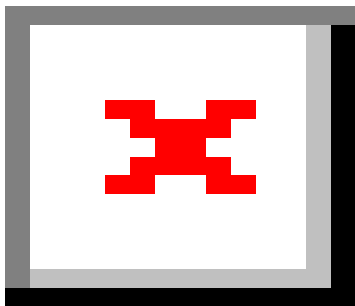


Photo 3: Residual waste storage bay. Material not stored within the bay.

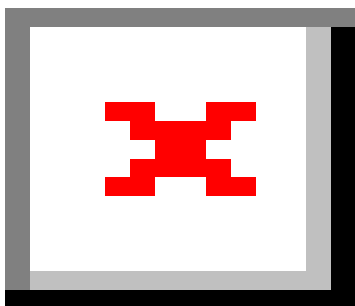


Photo 4: Damaged bay wall of the wood storage bay, viewed from the exempt yard.

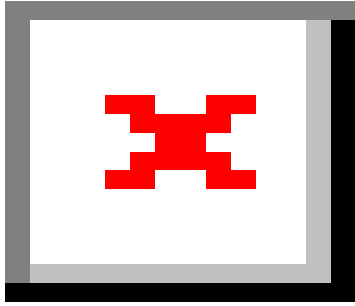


Photo 5: Showing fridges stored at back of site. Stockpile of soil preventing access to this part of site.

## EPR Compliance Assessment Report

**Report ID:  
CAR\_NRW0033420**

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

Site	Worldcare Wales Ltd	Permit Ref	UP3794FZ
Operator/Permit holder	World Care (wales) Ltd	Date	14/05/2018

### 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			
C4	C3	Ensure all waste on site is stored within skips and bays as required in the permit.	30/07/2018
B4	C3	Ensure all fridges / freezers are stored in bays or containers that meet the requirements set out in table 4.6(i).	30/07/2018
B1	C3	Wood storage bay wall must be repaired and maintained so that it is fit for purpose.	30/07/2018
A1	C3	Ensure all activities associated with permitted activities are stored within the boundary of the site permit.	30/07/2018

## 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.