

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

Site	Llandrindod Wells Household Waste Recycling Centre	Permit Ref	AB3091CN		
Operator/Permit holder	Sundorne Products (Llanidloes) Ltd				
Regime	Waste Operations				
Date of assessment	13/07/2018	Time in	09:50	Out	10:20
Assessment type	Site Inspection				
Parts of the permit assessed	1.1 General Management and 2.5 Technical Requirements Hazardous waste storage and treatment				
Lead officer's name	Starks, Madeleine				
Accompanied by					
Recipient's name/position	Mark Phillips/ TCM	Date issued	26/07/2018		

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
C1 - General Management - Staff competency/training	C3	1.1.1b
C2 - General Management - Management system and operating procedures	C3	1.1.1a
C4 - General Management - Storage, handling labelling and Segregation	C3	2.5.1

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	3	Total compliance score (see section 5 for scoring scheme)	12
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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

On Friday 13th July 2018, Environment Officer Madeleine Starks conducted a routine site inspection of Llandrindod Wells Household Waste Recycling Centre, focusing upon Technically Competent Manager (TCM) attendance. The weather conditions were dry, warm and partly cloudy.

I arrived on site and signed in. There was evidence of regular site attendance by the TCM, Mark Phillips, whose Continuing Competency Certificate is up to date. Notes were made to show communication between the TCM and staff on site to raise any issues noted during periods Mark was not available. Overall the site was tidy, however several storage containers were nearing capacity and there were further issues surrounding the containment of potentially Hazardous Waste streams, which are detailed below.

C4 – Storage, Handling, Labelling and Segregation – Permit Condition 2.5.1 – Technical Requirements **Hazardous waste storage and treatment - Category 3 Breach**

You have been scored for the mixing of potentially hazardous and non-hazardous waste. While on site I noted several household paint cans had been deposited in the mattresses skip. The mixing of hazardous and non-hazardous waste is an offence under the Hazardous Waste (Wales) Regulations 2005. Some household paints and other household chemical wastes are hazardous and potentially hazardous waste should not be mixed in with non-hazardous waste, in this case, mattresses. This directly contravenes the site's Environmental Management System (EMS) under Standard Operating Procedure (SOP) No. 3. The non-compliance demonstrates the lack of adequate staff training expanded upon below. This activity must stop. Please remove all paint containers from the mattress skip.

In addition, the remaining paints kept on site were in an unlabelled battery box, which was over-filled as the lid could not be shut (Image 2). This once again contravenes the instructions within the SOP3. Table 2.3 of your permit– Operating Techniques – also requires all potentially hazardous waste to be kept in clearly identified and secure containers.

C1 – Staff Competency and Training– Permit Condition 1.1.1(b) General Management

You have been scored for insufficient staff training. When I asked operators on site to show me a copy of the site's Environmental Management System (EMS), operators were not familiar with either the content or location of this document. Staff training should be part of the management system. All staff should be given training to ensure they are familiar with operating procedures on site. Once located, operators stated that they had not read the EMS nor been given training on it. Your permit requires activities to be managed and operated using sufficiently competent persons and resources. All staff must be familiar with the SOPs that form the EMS and it's purpose and contents.

The lack of adequate staff training is also likely to be the root cause of other issues observed on site and otherwise noted.

C2 – Management Systems – Permit Condition 1.1.1(a) - General Management

You have been scored for failing to operate in accordance with an adequate, written management

system. As mentioned above, it was observed that operators on site have allowed household paints to be deposited in the mattresses skips. SOP3 states that all potentially hazardous and non-hazardous household chemicals should be stored within a designated lidded container. This procedure is not being followed by staff.

Following our inspection please ensure that the EMS is updated and all staff on-site receive adequate training to address this non-compliance to prevent a reoccurrence. During subsequent site visits we may ask to inspect staff training records and these will be expected to demonstrate staff are trained to comply with site procedures.



Image 1 – Paint containers and split paint seen inside the mattress disposal skip.



Image 2 – Grey battery box overfilled with paint containers, lid cannot be shut.

Advice and Guidance

There are currently a large number of both refrigerators and fluorescent bulbs on site. The site operator informed me that the refrigerators were due to be collected on Wednesday 11th July, however nobody arrived to take these away. Consequently, I have concerns over the management of the site and the

potential for refrigerators to be stored incorrectly if further appliances are accepted from householders. Please endeavour to rearrange the missed collection as soon as possible.

Due to the large number of bulbs within the fluorescent bulb container, a few had escaped the contained and smashed on the floor. This poses a health and safety risk to members of the public who use the site and also highlights a hazardous waste containment issue. Please ensure that the fluorescent tube container is emptied regularly to prevent over spilling.



Image 3 – Large numbers of refrigerators on site.



Image 4 – Fluorescent tub storage container nearing full capacity, with top section over spilling.

EPR Compliance Assessment Report

**Report ID:
CAR_NRW0033644**

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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	Please remove all paint cans from the mattresses skip and ensure the household chemical store is emptied regularly to prevent over-filling.	10/08/2018
C2	C3	Please review the EMS to update staff training procedures.	31/08/2018
C1	C3	Update staff training and ensure all operators are familiar with the location and content of the EMS.	24/08/2018

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. 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.