

Compliance Assessment Report CAR_NRW0037298

Permit being assessed: BB3098HH.

For: Tip Top Toilets Waste Transfer Station, held by Tip Top Toilets Ltd

At: Fedw Hir, Llwydcoed, Aberdare, CF44 0DX.

Type of assessment carried out: Site Inspection, Reason: Routine.

On 18/12/2020 between 10:35 and 11:20.

Parts of permit assessed: 1.1.3; 3.2; 4.2; Table S1.1

NRW Lead Officer: Gillian Coates, accompanied by David Warwick-Brown.

Report sent to: Matthew Rees, Site Manager on 26/01/2021.

1. Summary of our findings (full details in section 4)

Part of permitted activity assessed (criteria)	Assessment result	Permit condition
G4 - Monitoring and Records, Maintenance and Reporting - Reporting and notification to Natural Resources Wales	C4 No impact	4.2.2 Within one month of the end of each quarter, the operator shall submit to Natural Resources Wales using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter

Result types are explained in more detail in the 'Important Information' section below.

Total number of non-compliances recorded	Total non-compliance score
1	0.1

How we use the non-compliance score to calculate your annual fee is explained in the 'Important Information' section below.

2. What action is required?

Criteria	Action needed	Complete by
G4	Submit all returns for Q1, Q2, Q3 and Q4 of 2020 to NRW by 31 January 2021.	31/01/2021

Action criteria codes are listed in the 'Important information' section below.

3. What will happen next?

Any non-compliance we have identified and recorded on this form is an offence. It can result in criminal prosecution and/or suspension or revocation of your permit.

At this time, we do not intend to take any further action.

This statement does not stop us from taking additional enforcement action if further relevant information comes to light or offences continue.

4. Details of our assessment

Waste Regulation officers Gillian Coates and David Warwick-Brown met with Matthew Rees and Martin Jeffries to conduct the site inspection. The visit was pre-arranged to ensure that no staff on site were infected with Covid-19 and social distancing was maintained throughout the inspection. The weather conditions were wet and rainy with very good visibility. Thank you for taking the time to show officers around the site.

It was explained that the site was set up on the former Groundwork Trust Eco Training facility. The existing eco building was being redeveloped to make offices for the business.

The first area inspected was the bunded tank area inside the poly tunnel where portable toilet waste was pumped out and stored before being tankered out for treatment and disposal. The tank was described as having a 20,000 litre capacity with the external bund having capacity of 60,000 litres. The tank and bund both appeared to be in good condition in the areas that could be observed. The poly tunnel had doors, which were kept closed when the tank was not in use, which helped to reduce the number of flies such wastes would attract. Officers were informed that the 20,000 litre tank was sufficient capacity for operations and required emptying 4 - 5 times per year with the toilet wastes going for treatment and disposal to [Egan Waste](#).





Officers next inspected the covered wash down bay which had been in full use for the 7 weeks previous to the inspection. The concrete floor of the wash down bay was constructed to slope towards the drain set in the rear of the bay. Officers noted that a small puddle of water was present to the front left of the wash down bay and advised that the floor level needed correction to prevent this and that the operator should consider installing an Aco type drainage channel across the front of the wash down bay to prevent contaminated water egress onto the main site.





The building housing the runoff tank was located immediately next to the covered wash down bay. This was described as having a 2,000 litre capacity and when full was pumped out by the Tip Top Toilets own tanker vehicles and discharged into the main poly tunnel tank on site. The run off tank and bund seemed to be in good condition and fit for their purpose.



Officers were told that Tip Top Toilets currently operated 15 - 20 canteen type units, 25 welfare facility units and 120 portable toilets. Covid had not affected business too badly because the usual demand from festivals and outdoor events had been replaced somewhat by demand from organisations and businesses requiring external toilets and welfare units that would provide socially distant facilities for staff and visitors.



Officers were taken to see the biomass boiler system, the eco building and the Klargester septic tank system. Further eco-improvements including capture of rainwater were highlighted during the visit.





The inspection concluded with officers requesting the WAMITAB certificate for the technically competent manager for the site which was to be sent on following the visit.

ACTIONS

1. **Submit all outstanding quarterly waste returns to NRW by 31 January 2021 see [NRW Waste Returns](#)**
2. **Submit WAMITAB certificate to gillian.coates@cyfoethnaturiolcymru.gov.uk by 31 January 2021**
3. **Correct floor level in washdown bay to prevent pooling of contaminated water**
4. **Consider installation of aco style drainage to the front of the washdown bay to prevent contaminated water egress**

If you require any clarification regarding this report please contact Gillian Coates on gillian.coates@cyfoethnaturiolcymru.gov.uk

In this document 'Natural Resources Wales' means the Natural Resources Body for Wales established by Article 3 of the Natural Resources Body for Wales (Establishment) Order.

If you have any queries about this report, or to discuss completion of any actions, please contact the NRW Officer named above.

Important information

Legal status of this report

Your permit is issued to you under the Environmental Permitting Regulations. You have a responsibility to comply with the conditions of your permit and prevent pollution/harm of the environment. You must also ensure that you comply with any other relevant legislation that may apply to your site's operations.

This report explains the findings of our assessment and any action you are required to take. We categorise non-compliance using our guidance for assessing non-compliance at regulated sites.

When we find potential non-compliance/s we will normally give you advice on how to maintain compliance.

To correct non-compliance, we may:

- require you to take specific actions
- issue a notice
- review the conditions of your permit.

Any advice and guidance we give will be without prejudice to any other enforcement response that we consider may be required.

Assessment results and non-compliance categories (used in section 1):

Assessment result	Description
Assessed (A)	Assessed or assessed in part, no evidence of non-compliance found
Action only (X)	Action only relating to the activity assessment
Ongoing (O)	Ongoing non-compliance, not scored

Non-compliance category	Description	Score
C1 Major	Potential to have a major, serious, persistent and/or extensive impact or effect on the environment, people and/or property	60
C2 Significant	Potential to have a significant impact or effect on the environment, people and/or property	31
C3 Minor	Potential to have a minor or minimal impact or effect on the environment, people and/or property	4
C4 No environmental impact	Non-compliance at a regulated site that cannot foreseeably have any impact on the environment, people and/or property	0.1

How we use assessment scores

The number and severity of non-compliances recorded in a year will affect your annual subsistence fee the following year. A non-compliance factor is added to your site's Operator

Performance Risk Appraisal (OPRA) score when we calculate your fee to reflect the additional resource we use to assess permit compliance.

What are suspended scores?

In line with our guidance, we may suspend scores for up to six months to allow time for remedial action to be taken. Suspended scores will be re-instated if the action is not completed.

Full list of Industry and Waste action criteria (used in section 1 and 2):**A: Permitted activities**

- A1 Specified by permit

B: Infrastructure

- B1 Infrastructure – Engineering for prevention and control of emissions
- B2 Infrastructure – Closure and decommissioning
- B3 Infrastructure – Site drainage engineering (clean and foul)
- B4 Infrastructure – Containment of stored materials
- B5 Infrastructure – Plant and equipment

C: General management

- C1 General management – Staff competency/training
- C2 General management – Management system and operating procedures
- C3 General management – Materials acceptance
- C4 General management – Storage, handling, labelling and segregation

D: Incident management

- D1 Incident management – Site security
- D2 Incident management – Accidents, emergency and incident planning

E: Emissions

- E1 Emissions – Air
- E2 Emissions – Land and groundwater
- E3 Emissions – Surface water
- E4 Emissions – Sewer
- E5 Emissions – Waste

F: Amenity

- F1 Amenity – Odour
- F2 Amenity – Noise
- F3 Amenity – Dust/fibres/particulates and litter
- F4 Amenity – Pests/birds and scavengers
- F5 Amenity – Deposits on road

G: Monitoring and records, maintenance and reporting

- G1 Monitoring and records, maintenance and reporting – Monitoring of emissions and environment
- G2 Monitoring and records, maintenance and reporting – Records of activity, site diary/journal/events
- G3 Monitoring and records, maintenance and reporting – Maintenance records
- G4 Monitoring and records, maintenance and reporting – Reporting and notification to Natural Resources Wales

H: Resources efficiency

- H1 Resource efficiency – Efficient use of raw materials
- H2 Resource efficiency – Energy efficiency

Enforcement response

Any permit condition non-compliance is an offence and we may take legal action against you. Action we take can include prosecution, serving a notice on you and/or suspension or revocation of your permit. See our Enforcement and Sanctions Guidance for further information.

Data protection notice

You should make sure that anyone named in this report knows that the information it contains will be processed by Natural Resources Wales to fulfil its regulatory and monitoring functions and to maintain the relevant public register(s).

We may also use and/or disclose the report in connection with:

- offering or providing you with our literature or services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. 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 our service
- Freedom of Information Act or Environmental Information Regulations requests.

We may also pass it on to our agents or representatives to do these things on our behalf.

Disclosure of information – this report will be available to view on-line

If you think this report contains commercially confidential information that should not be placed on our public register, you must contact your local Natural Resources Wales office within **fifteen working days** of receiving this report, using the contact details in the accompanying email or letter. You must give a full explanation of why it should not be added to our public register, including specifying which information is commercially confidential. We will assess your request and respond to you within 20 working days to let you know if we agree to your request.

What do I do if I disagree with the report or have a complaint?

If you disagree with this compliance assessment report, you should contact the lead officer without delay to discuss your concerns.

If you are unable to resolve the issue with the lead officer or their line manager you should contact our Customer Contact team on 0300 065 3000 (Monday to Friday 08:00 – 18:00), or email enquiries@naturalresourceswales.gov.uk for details of how to raise your dispute further through our Complaints and Commendations procedure.

If you are dissatisfied with our response, you can contact the Public Services Ombudsman for Wales by phone on 0300 7900203 or by email at ask@ombudsman.wales

Welsh Language Standards

We are committed to establishing Natural Resources Wales as a naturally bilingual organisation. We will provide compliance reports in your preferred language.